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July 25, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Mobility Fund Phase II, WT Docket 10-208; Connect America Fund, WC Docket 10-90

Dear Ms. Dortch,

In separate meetings on July 24, 2017, Joan Marsh, Stacy Fuller, and the undersigned of AT&T Services, Inc., met with David Grossman and Daudeline Meme of Commissioner Clyburn's office and Amy Bender of Commissioner O'Reilly's office.

During both meetings, AT&T expressed support for the draft Mobility Fund II Order on Reconsideration and draft Challenge Process Order. Adopting, in part, the CTIA proposal to conduct a MFII-specific data collection and a concise targeted challenge process should help target the areas that truly need MFII support. Too many Americans in rural areas continue to have no or inadequate mobile wireless voice and broadband service. Targeting support to the areas that have proven to be uneconomic to serve without subsidy is the purpose of the Connect America Fund and AT&T urged the Commission to put the needs of rural consumers first. For example, AT&T indicated that its internal analysis supports the draft's conclusion that a 70/30 cell edge probability and loading factor will help drive funding towards truly unserved consumers rather than those that already have high quality LTE service.

In addition, the company noted that targeting mobile wireless to the rural consumers that need it is worth the time and effort that all challengers and challenged parties will undertake in the detailed challenge process. Validating propagation model results by collecting on-the-ground data is essential to ensure MFII reflects consumer experience.

AT&T also looks forward to submitting comments in response to the CAF II Auction Procedures Public Notice. If you have any questions regarding this filing please do not hesitate to contact me at (202) 457-2041.

Sincerely,

Mary L. Henze

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cc: A. Bender
D. Grossman
D. Meme

AT&T

