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July 26, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: WC Docket No. 10-90
WT Docket No. 10-208

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we provide you with notice of an oral ex parte presentation in connection with the above-captioned proceedings. On July 24, 2017, Grant Spellmeyer and undersigned counsel on behalf of United States Cellular Corporation ("U.S. Cellular") met with Daudeline Meme and Jeremy Greenberg in Commissioner Clyburn's office, and Amy Bender in Commissioner O'Rielly's office.

U.S. Cellular discussed the upcoming Mobility Fund Phase II item, including the recently released draft order in the above-captioned proceedings. Specifically, U.S. Cellular is pleased to support the concept of a one-time data collection in place of using FCC Form 477 data. Over the past several months, a number of wireless carriers in conjunction with CTIA have worked to develop a consensus around how mapping data would be submitted. In the draft item, the CTIA plan was adopted with two proposed adjustments. The cell edge probability was changed from 90% to 70% and the cell loading factor was reduced from 50% to 30%.

U.S. Cellular noted that it builds networks consistent with the standards agreed to in the CTIA plan, and urged the Commission to retain these requirements in the final order. The proposed adjustments will increase the relative cell size, in some cases significantly, reducing the amount of area eligible for Mobility Fund Phase II support. Many of these areas near the cell edge today require improvements that cannot be made without support. By reducing the proposed cell edge speed from 10 Mbps to 5 Mbps, the Commission is already limiting rural citizens' ability to achieve service levels that are reasonably comparable to those in urban areas. Any move to reduce cell edge probability and cell loading factors will limit rural investments in areas where people live, work and travel, further reducing the quality of service available to rural consumers over the ten-year life of the fund, relative to urban areas.

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CCA has also submitted data proposing to include additional factors to increase the accuracy and utility of the one-time mapping project. U.S. Cellular supports those changes and urges the Commission to adopt them.

Regarding the challenge process, U.S. Cellular explained that the time needed to analyze maps, deploy technicians, drive test relevant areas, analyze drive test data, and prepare challenge submissions, is significant. The Commission's proposal to allow only 60 days to conduct a challenge is insufficient. U.S. Cellular advocates adoption of a 120-day proposal, which is far more realistic for carriers having to drive test significant rural areas. This is especially true between the months of November and April, when areas in New England, the Midwest, upper Midwest, and far West experience winter weather, limiting opportunities and driving distances that can be covered to test remote areas.

U.S. Cellular recommends providing carriers with at least 90 days to submit the initial one-time data collection, similar to what carriers are allotted today in the FCC Form 477 process.

Finally, U.S. Cellular suggested that, with over \$4.5 billion at stake, significant decisions relating to the challenge process and auction procedures should be decided at the Commission level and not delegated to the Bureaus.

Should you have any questions, please contact undersigned counsel directly.

Respectfully submitted,



David LaFuria
Counsel for United States Cellular Corporation

cc: Daudeline Meme
Amy Bender
Jeremy Greenberg
Grant Spellmeyer