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July 27, 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 25, 2017, Grant Spellmeyer and undersigned counsel on behalf of United States Cellular Corporation ("U.S. Cellular") met with representatives of the Wireline Competition Bureau and the Wireless Telecommunications Bureau, including Margaret Wiener, Chelsea Fallon, Audra Hale-Maddox, Gary Michaels, Michael Janson, Christiaan Segura, Paroma Sanyal, Jessie Friend, Patrick Sun, Kenneth Lynch, Jonathan McCormack, Murtaza Nasafi, Ben Freeman, Thomas Parisi, Kathryn Hinton (telephonically), and Thuy Tran (telephonically). We also met with Nicholas Degani, Jay Schwarz, and Rachael Bender in Chairman Pai's office. On July 26, 2017, Grant Spellmeyer telephoned Mr. Degani to follow up on their meeting.

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.

U.S. Cellular provided a recent blog post from T-Mobile, containing a comparison of network performance with their competitors (<https://newsroom.t-mobile.com/news-and-blogs/tmobile-best-unlimited-network.htm>), evidencing download speeds in excess of 26 Mbps. This supports congressional testimony given earlier this year by U.S. Cellular's Chairman Ted Carlson, in which he noted that consumers nationwide are now experiencing average speeds of over 12 Mbps, and carriers are delivering much faster speeds in urban areas. By blocking out areas receiving in excess of 5 Mbps from eligibility for support, and setting the target speed for 2028 at 10 Mbps, the Commission may be increasing the urban/rural gap, not closing it.

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 the distances and the opportunities to test remote areas. On July 27, 2017, Mr. Spellmeyer followed up telephonically with Mr. Degani to reiterate U.S. Cellular's view that appropriate time intervals in the challenge process are needed to provide carriers with sufficient time to complete analysis and testing.

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

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Finally, U.S. Cellular suggested that 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 (with enclosure):

Nicholas Degani
Jay Schwarz
Rachael Bender
Margaret Wiener
Chelsea Fallon
Audra Hale-Maddox
Gary Michaels
Michael Janson
Christiaan Segura
Paroma Sanyal
Jessie Friend
Patrick Sun
Kenneth Lynch
Jonathan McCormack
Murtaza Nasafi
Ben Freeman
Thomas Parisi
Kathryn Hinton
Thuy Tran
Grant Spellmeyer

Proof Positive. T-Mobile Does Unlimited Better.

July 17, 2017



Neville Ray
(/news-and-blogs/?author_id=4)
Chief
Technology
Officer

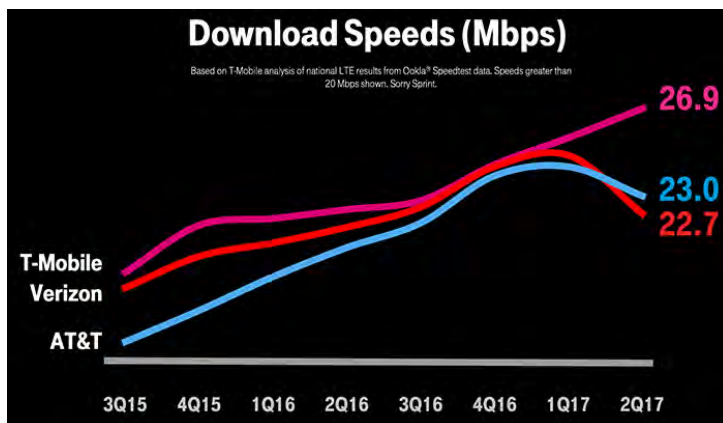
I've been saying it all along. The Un-carrier's got the only network built for unlimited. Now, the carriers have offered proof.

Earlier this year, AT&T and Verizon finally followed our lead and got on board with the unlimited future. Since then, they've shown us all exactly what happens when you jump into unlimited without a network built to handle it. They've proven that T-Mobile is America's best unlimited network.

T-Mobile's No.1 in Network Speed. Again.

T-Mobile was No.1 on network speed—AGAIN—according to our analysis of the latest network performance reports. We're talking 14 quarters (42 months!!) and counting. That's forever in wireless years. And those results were based on millions of real-world customer experiences across all networks from Speedtest.net (and consistent with download speed data from another independent third party).

That's great news for our customers. But that's not the real story here.



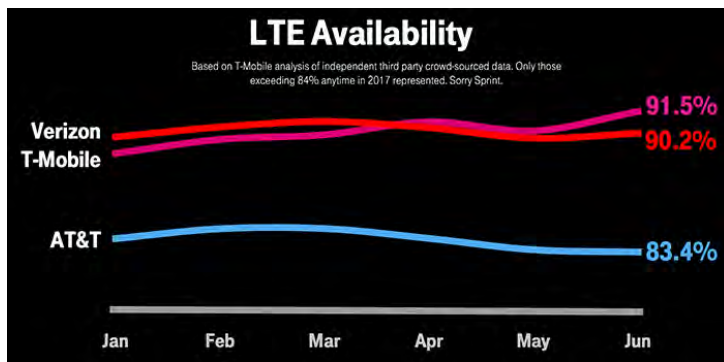
The real news is how dramatically both AT&T and Verizon's networks have caved since making unlimited available to their customers—all while T-Mobile's network has continued to soar. That chart? That's what it looks like when carriers jump into unlimited without doing the hard work to make sure their networks are ready.

In that chart, you can see that Verizon has plunged all the way down to third place behind AT&T on network speed. That's just in the first full quarter since offering unlimited. Ouch. How the mighty have fallen. (<https://newsroom.t-mobile.com/news-and-blogs/categories/network/verizon-network-ranking-drops.htm>)

But that's not all.

T-Mobile's No.1 in LTE Availability. For Real.

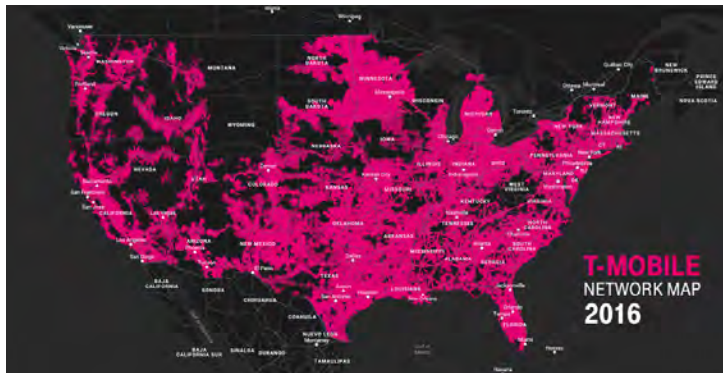
In our latest analysis of independent third party network performance tests, T-Mobile not only ranked No.1 on speed but also ranked No.1 in LTE availability. Which means T-Mobile customers get an LTE signal more often than customers of any other national provider.



That's really gotta sting.

T-Mobile's total LTE footprint now rivals the carriers' (<http://www.reuters.com/article/us-t-mobile-m-a-network-idUSKBN18S3UT>) . And we've done this by expanding (<https://www.pcmag.com/news/354143/a-peek-inside-t-mobiles-massive-lte-growth>) our LTE network at a record-shattering pace—doubling our LTE coverage since 2015. T-Mobile now covers 315 million people nationwide with wicked-fast LTE. By the end of the year, we expect to expand LTE coverage to 321 million people.

As of this this quarter, we've essentially completed our rollout of 700 MHz Extended Range LTE. And, this year, we'll begin rolling out our newly acquired mother lode of 600 MHz spectrum. This team is moving so damned fast we're effectively executing in six months what is normally a two-year process to deploy a new band of spectrum. That's from close of the spectrum auction to lighting up the first customer phones on 600 MHz. And we can confirm that both Samsung and LG plan to have 600 MHz banded phones available in Q4 this year. Nobody does that! Nobody but this team, that is.



Projected end of year coverage; includes 600 MHz 4G LTE deployment; capable device required.

T-Mobile's Network is Advancing Faster

In recent years, every meaningful network innovation has been available first on T-Mobile. I'm talking about VoLTE, HD Voice, worldwide Wi-Fi Calling, Enhanced Voice Services, 4G LTE CellSpots and Rich Communications Services. Just last month, the team completed the nation's first use of License Assisted Access (LAA)—hitting 741 Mbps download speeds in a field test on our network. And, we were the first national provider to make LTE-U available to customers. And just last week we were the first on the continent to successfully complete Narrowband IoT field tests on a live commercial network. Of course last year we had already achieved a global first with 4x4 MIMO and were first with 256 QAM – technologies that significantly improve speed and performance for customers. Now we have these technologies combined with carrier aggregation in hundreds of cities! Poor AT&T is attempting to roll this stuff out in a couple of places and calling it "5G Evolution." I guess it must feel super advanced to them, or maybe it'll take them until 2020 to roll it out.

LTE-Advanced Scorecard				
Technology	T-Mobile	Verizon	AT&T	Sprint
LTE-U/LAA	1 st live trial	Trial	Trial	
NB-IoT	1 st live trial			
VoLTE with eSRVCC	1 st	?	?	
Carrier Aggregation	✓	✓	✓	✓
CoMP	✓	✓	✓	✓
SON	✓	✓	✓	✓
HetNets	✓	✓	✓	✓
EVS	1 st			
Higher Order Modulation	1 st	✓	✓	✓

We've built our network—and our entire network team—to advance faster than anybody else out there. We're a mobile internet company and our network advances at internet speed. Next up, we'll take the country's fastest, most advanced LTE network to a whole new level—and light up the country's first real, nationwide 5G network (<https://newsroom.t-mobile.com/news-and-blogs/nationwide-5g-blog.htm>), blowing by the competition again.

Share

< PREVIOUS ENTRY (</news-and-blogs/5g-mid-band-spectrum.htm>)

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