



WASHINGTON, DC

STEPHEN E. CORAN  
202.416.6744  
SCORAN@LERMANSENTER.COM

August 25, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Wireless Internet Service Providers Association**  
**WC Docket No. 10-90**  
**Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On August 25, 2017, Fred Goldstein, Technical Consultant to the Wireless Internet Service Providers Association (“WISPA”), and undersigned counsel to WISPA met by telephone with Suzanne Yelen, Chelsea Fallon and Heidi Lankau of the Wireline Competition Bureau and Zai Sleem of the Wireless Telecommunications Bureau to discuss the recommended propagation data the Commission included as Appendix A to its *Public Notice* seeking comment on rate-of-return study areas that are potentially overlapped by unsubsidized competitors.<sup>1</sup>

Mr. Goldstein discussed propagation models and modeling software wireless Internet service providers (“WISPs”) typically use for planning and coverage prediction purposes. He described how the most popular software WISPs use for this purpose makes use of the Irregular Terrain Model, enhanced for clutter based on a proprietary interpretation of the Hata data and a publicly available land cover database with approximately one arc-second resolution. This is used to predict point-to-point coverage on identified paths and to produce coverage maps based on the parameters entered by the user, such as antenna gain, height, and frequency.

The WISPA representatives indicated that they would be available to answer questions from Commission staff as the process moves forward.

---

<sup>1</sup> See *Public Notice*, “Wireline Competition Bureau Publishes and Requests Comment on Rate-of-Return Study Areas Potentially 100 Percent Overlapped by Unsubsidized Competitors,” DA 17-760 (rel. Aug. 11, 2017).



Marlene Dortch, Secretary

August 25, 2017

Page 2

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Suzanne Yelen  
Chelsea Fallon  
Heidi Lankau  
Zaid Sleem