



John Deere Intelligent Solutions Group  
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November 8, 2016

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Meeting**  
**WC Docket No. 10-90; WT Docket No. 10-208**

Dear Secretary Dortch,

On November 4, 2016, Mark N. Lewellen, Manager, Spectrum Policy and John Rauber, Director, North American Public Affairs, Agriculture & Turf Division of Deere & Company (“John Deere”), and Hunter Carpenter, Director of Public Policy, with the Agricultural Retailers Association (“ARA”) along with Catherine Wang and Tamar Finn from Morgan Lewis & Bockius, LLP, outside counsel to John Deere, met separately with Edward Smith, Legal Advisor to Chairman Tom Wheeler; Amy Bender, Legal Advisor to Commissioner Michael O’Rielly and Travis Litman, Senior Legal Advisor to Commissioner Jessica Rosenworcel, to express support for the Mobility Fund II (“MF Fund II”) and the Commission’s goal to expand broadband deployment to rural areas that remain unserved or underserved by broadband services.

The ABC specifically urged the Commission to address the expanding need for advanced telecommunications capability in active agricultural areas -- areas that are vital economic drivers for rural communities and the source of livelihoods for a majority of rural Americans -- as it designs Phase II of the Mobility Fund and strives for more accurate measures of where 4G LTE coverage is actually available. MF-II funds directed solely to cover road miles will not adequately address the need for wireless coverage in cropland areas -- where a significant portion of rural populations work.

As we discussed, a bipartisan group of 26 Senators and numerous participants in this proceeding have urged the FCC to address the need for mobile broadband coverage on croplands or in agricultural areas.<sup>1</sup> ABC urged the Commission to make explicit that agriculture is a factor

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<sup>1</sup> See Letter to Chairman Tom Wheeler, FCC from United States Senators Wicker, Manchin, et al. (July 11, 2016); Ex Parte Notice from Jill Canfield, NTCA-The Rural Broadband Association

that should be accounted for in the eligibility or bidding process. One means to do so would be to weight unserved road miles that also serve cropland. To ensure that such weighted bids increase coverage on cropland in addition to road miles, the Commission also should explicitly include cropland in construction milestones and coverage requirements. Because croplands are areas of economic activity where rural Americans work, this weighting could help ensure public resources are spent where demand exists.

The ABC also expressed concerns that coverage maps submitted in the Form 477 process are based on advertised coverage that does not necessarily identify areas where wireless broadband is actually available. In John Deere assessments of actual coverage in agricultural areas, the company has identified areas where coverage is both overstated and understated by the Commission's current method of determining coverage. The participants discussed the need to identify accurately areas without mobile broadband coverage, both in the initial list of eligible areas and through a challenge process based on empirical evidence. Some examples of empirical evidence that could be submitted in the challenge process include drive tests and the results of tests of John Deere's JDLINK™ system.

Finally, the challenge process should not preclude potential wireless customers from submitting empirical evidence to show that an area lacks mobile broadband and should be added to the list of road miles/cropland eligible for MF-II funding. Ideally public funds should be dedicated to areas where there is both supply and demand and permitting potential customers to participate in the challenge process could provide the Commission with valuable information about potential demand.

The steps outlined in our discussions would directly serve the Commission's stated goal of facilitating the deployment of wireless and broadband services to areas where rural Americans live, travel, and work. If adopted, these recommendations would better position the MF Fund II to enable rural Americans to take advantage of rapidly advancing agricultural technology and to participate more fully in the modern digital economy on par with citizens in urban and suburban areas.

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to Marlene Dortch, FCC Secretary, at 2 (filed Oct. 27, 2016); Ex Parte Letter from Caressa D. Bennett, Rural Wireless Association to Marlene Dortch, FCC Secretary, at 4 (filed Oct. 27, 2016); Ex Parte Notice from Robert F. West, CoBank AB to Marlene Dortch, FCC Secretary, at 2 (filed Oct. 28, 2016); Ex Parte Letter from Courtney Neville, Competitive Carriers Association to Marlene Dortch, FCC Secretary, at 2 (filed Sept. 15, 2016); Ex Parte Notice from David LaFuria, Counsel to United States Cellular Corp. to Marlene Dortch, FCC Secretary, Presentation Attachment, at 21 (filed March 3, 2016).

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The attached presentation was distributed at the meeting. If you have any questions regarding this *ex parte* notice, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Mark N. Lewellen

Deere & Company  
Manager, Spectrum Policy

Attachment

cc: Edward Smith  
Amy Bender  
Travis Litman