



T-Mobile USA, Inc.
601 Pennsylvania Avenue, Washington, DC 20004

December 14, 2018

Via Electronic Filing

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

Re: WT Docket No. 10-208: Universal Service Reform – Mobility Fund
WC Docket No. 10-90: Connect America Fund

We write to correct several misrepresentations made to the Federal Communications Commission (“Commission”) by the Rural Wireless Association (“RWA”) as reflected in its December 10, 2018 Notice of *Ex Parte* Presentation. In that filing, RWA claims that T-Mobile USA, Inc. (“T-Mobile”)¹ overstates its 4G LTE coverage in its submitted Mobility Fund Phase II (MF-II) shapefiles.² T-Mobile has not been contacted by the Commission regarding the agency’s announced investigation into alleged violations of the MF-II 4G LTE data collection and has no reason to believe that T-Mobile is involved. RWA’s vague and irresponsible statements regarding T-Mobile’s MF-II maps are unsupported by any evidence and are patently false.

T-Mobile has a proven track record of expanding and improving advanced mobile broadband services in rural communities through its efforts to deploy 4G LTE and 5G service to unserved and underserved areas and plans to continue bringing even better service to rural communities. Contrary to RWA’s claim that T-Mobile submitted “future” coverage, T-Mobile followed required procedures and submitted shapefiles reflecting 4G LTE coverage as of December 2017. This is consistent with the Commission’s instructions that mobile providers should submit shapefiles reflecting coverage “as of August 4, 2017, or later.”³ The 4G LTE coverage maps are a static

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

² See Letter from Caressa D. Bennet, General Counsel, Rural Wireless Association, to Marlene H. Dortch, Secretary, FCC, WT Docket Nos. 10-208, 18-197, WC Docket Nos. 10-90, 18-89 at 2 (Dec. 10, 2018) (noting that “[a]s RWA members took speed tests – they witnessed coverage go up).

³ See FCC, *Mobility Fund II 4G LTE Data Collection Instructions* (“Mobile wireless broadband providers must submit polygons in a shapefile format representing geographic coverage nationwide (excluding Alaska, but including U.S. territories) for 4G LTE deployed in each frequency band and bandwidth as of

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snapshot in time. Rather than overstating T-Mobile coverage, the submitted files more likely understate coverage as T-Mobile continued to expand its network throughout the challenge process.⁴

RWA's misrepresentations are part of an ongoing pattern of baseless allegations by the organization against T-Mobile designed to delay or thwart competition in rural America and deprive rural Americans of meaningful choice for broadband services.⁵ The organization's repeated disregard for fact-based advocacy is a disrespectful waste of Commission time and resources.

T-Mobile welcomes the opportunity to respond to certified MF-II challenges when the Commission opens the response window.⁶ In the meantime, we urge the Commission to disregard RWA's baseless allegations.

Sincerely,



Kathleen O'Brien Ham,
Senior Vice President, Government Affairs

cc: Nathan Eagan
Kirk Burgee
Chelsea Fallon
Aaron Goldberger

August 4, 2017, or later.”), <https://us-fcc.app.box.com/s/u89eip7608jyntvyhqkr80y2abj1yye> (last visited Dec. 12, 2018).

⁴ RWA also claims that T-Mobile's use of satellite backhaul renders it incapable of delivering download speeds of 5 Mbps. As a technical matter, this is patently false and further underscores that RWA's statements are without merit. Although T-Mobile uses satellite backhaul in a tiny fraction of the sites, these sites are fully capable of delivering download speeds of 5 Mbps.

⁵ See, e.g., Letter from Steve B. Sharkey, Vice President, Government Affairs, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 16-319 (Nov. 30, 2016); Letter from John Hunter, Senior Director, Engineering and Technology Policy, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 16-319 (Mar. 20, 2017); Letter from Steve B. Sharkey, Vice President, Government Affairs, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 16-319 (June 8, 2017). In this case, neither RWA nor any RWA member has ever contacted T-Mobile with concerns regarding its coverage or maps.

⁶ See *Procedures for the Mobility Fund Phase II Challenge Process*, Public Notice, 33 FCC Rcd 1985, 2005 ¶ 43 (2018) (“Following the close of the challenge window, the USAC portal system will process the data submitted by challengers.... [T]he response window will open no sooner than 30 days after the USAC system finishes processing the data submitted by challengers.”).