

DECLARATION OF LYNN MERRILL

I, Lynn Merrill, declare as follows:

1. My name is Lynn Merrill. I am over the age of 18 and competent to make this declaration. The statements in this declaration are true and within my personal knowledge.

2. I am the Chief Executive Officer for Monte R. Lee (“MRL”), a consulting engineering firm based in Oklahoma City, Oklahoma that has been retained to assist in the MF II challenge process by Rural Wireless Association (“RWA”) members which includes Sagebrush Cellular, Inc., Panhandle Telecommunications, Inc., and Pine Belt Cellular, Inc.

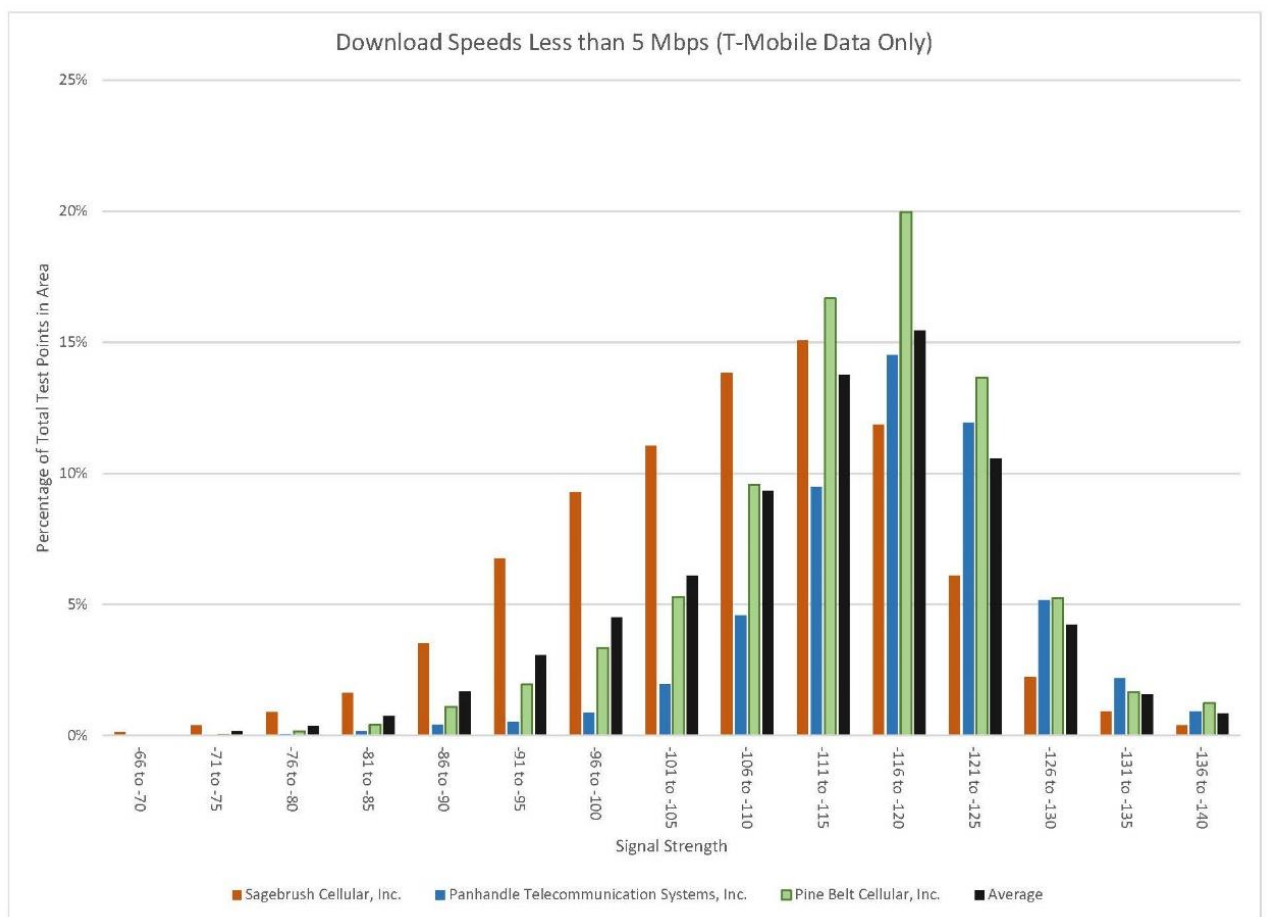
3. I am a professional engineer licensed in 31 states, including Alabama, Montana and Oklahoma. MRL is an associate member of RWA and I participated in ex parte meetings as a member of RWA at the Federal Communications Commission on December 6, 2018 in Washington, DC as documented by the ex parte filed on December 10, 2018.

4. In those meetings I stated that T-Mobile overstated its coverage in its Mobility Fund Phase II filings submitted in the USAC portal. I based that statement on the results of MRL’s analysis of the drive testing data that Sagebrush, Panhandle, and Pine Belt took during the MF II challenge period. These results are provided in Attachments A, B, and C.

5. After an extensive review of the data collected and a review of the client provided buildout activity of T-Mobile since January 4, 2018, I concluded that T-Mobile overstated its coverage or filed coverage it anticipated it would have over time.

6. The download speed data points collected indicate that T-Mobile greatly overstated its coverage in the January 2018 MFII filing in the three geographical areas presented. A detailed review of the signal strengths of the test points showing speeds of less than 5 Mbps indicates that the areas tested in Montana have a significantly higher percentage of points with good signal

strength (the difference in the average of signal strength is 8.72 dBm – doubled by three times higher in Montana than in Alabama and Oklahoma). With this level of signal strength, T-Mobile should have been able to meet the required 5 Mbps download speed in the areas tested in Montana when compared to the areas tested in Oklahoma and Alabama. This discrepancy is depicted in the following chart showing the percentages of test points with download speeds below 5 Mbps at various signal strengths. The doubling by nearly three times the signal strength (8.72 dBm) required in Montana to meet the same throughput threshold as the two other states indicates that a large anomaly occurred within the network directly lowering the areas where 5 Mbps download speed should occur and did not.



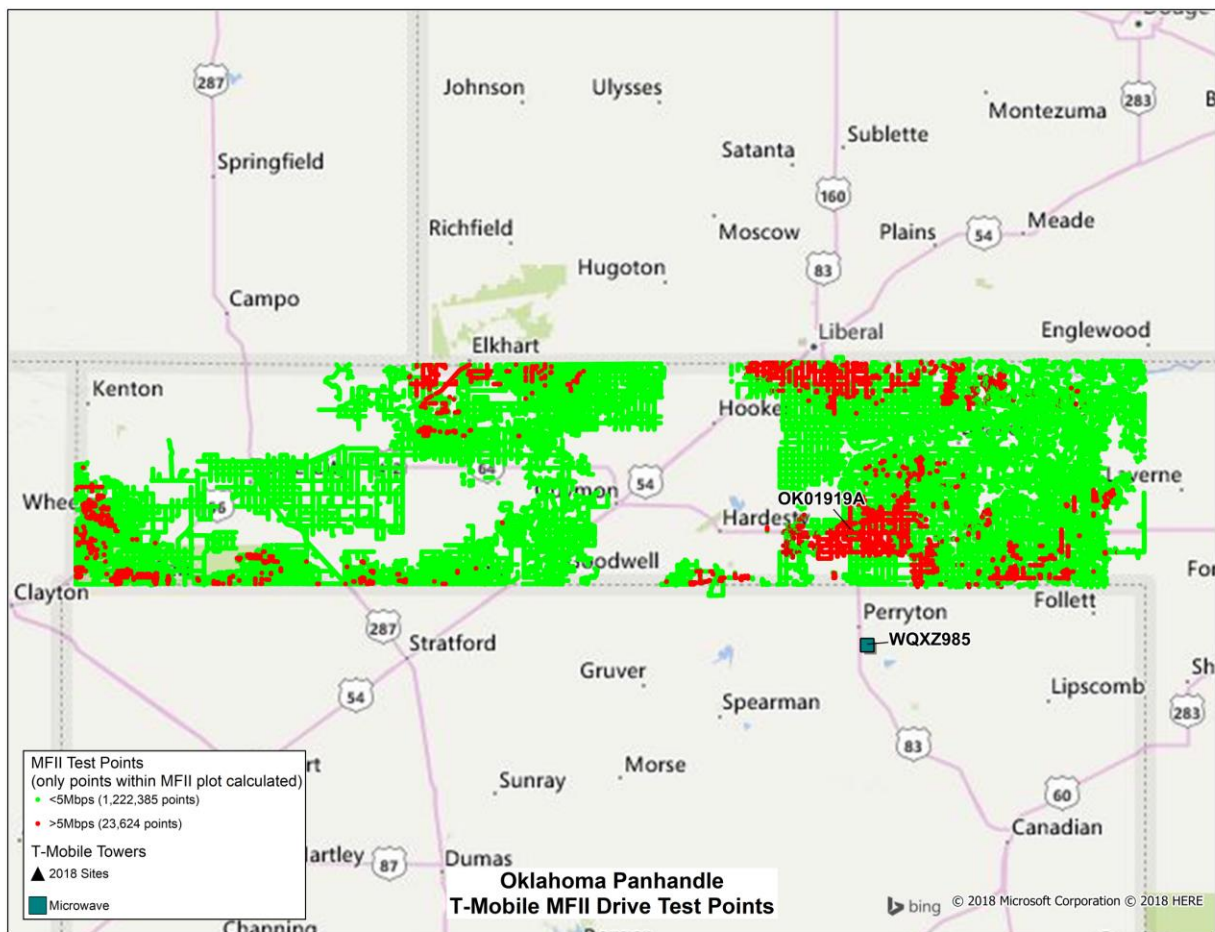
Furthermore, when comparing the latency for the entire T-Mobile data set as illustrated in the table below, the Montana area has an average latency at 426 milliseconds, nearly four times higher than the average latency in both the Oklahoma and Alabama test areas (109 milliseconds and 104 milliseconds, respectively).

MFII T-Mobile Test Latencies from Filed Challenges		
Panhandle Telecommunications Systems, Inc.		Average
	Less Than 5Mbps	95
	Greater Than 5Mbps	125
	Total (with Signal)	109
Pine Belt Cellular, Inc.		Average
	Less Than 5Mbps	103
	Greater Than 5Mbps	107
	Total (with Signal)	104
Sagebrush Cellular, Inc.		Average
	Less Than 5Mbps	467
	Greater Than 5Mbps	207
	Total (with Signal)	426
NOTES:		
1. All calculations are performed using test points with any measurable signal strength.		
2. The speed 5Mbps refers to download speeds recorded.		

With this data, it is clear that issues within the T-Mobile network in the Montana test areas prohibit the download speeds from reaching the speeds required by the MF II challenge requirements and the latencies are outside of the test norms compared to other areas. Without having direct access to key performance indicators (KPI) for the T-Mobile network in Montana, it is impossible to know the cause of this poor performance. Based on sound engineering principles, a general assumption can be made that the most likely cause of this high latency and low download speed occurs when sites rely upon satellite for backhaul. When throughput is limited, there is a substantially higher probability that

an insufficient amount of bandwidth is available at any given time. (This can be seen with multiple testers in a cell site area taking readings simultaneously and consuming more capacity.) Limited throughput coupled with significantly higher latency suggests that a satellite backhaul is used, preventing the download speeds from meeting the 5 Mbps requirement, particularly with multiple devices operating simultaneously.

7. Additionally, the challenge data suggests that T-Mobile has built out sites after the January 4, 2018 filing date that cover areas claimed by T-Mobile within the challenge area. One easy-to-illustrate example is the OK 01919A (Balko) site pictured below. In the January 4, 2018 filings, T-Mobile claimed to cover the Balko, OK area.

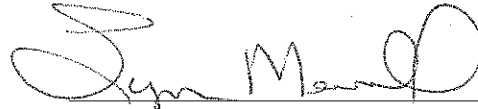


When the MFII maps were made available for challenge, Panhandle's staff members were

unable to locate any T-Mobile cell sites in the Balko, OK area. Based on the absence of any T-Mobile facilities in this area, the claimed coverage in Balko, if correct, could only have been provided by facilities utilizing the Perryton microwave cell site. If this is indeed how such coverage was claimed to have been obtained, one would expect the T-Mobile service to become worse the farther north and away from Perryton when tests were conducted.

However, this mapped data illustrates the opposite. With green representing download speeds below 5 Mbps and red illustrating download speeds above 5 Mbps, the coverage is shown to improve around Balko, OK. The test data collected from challenges show download speeds above the 5 Mbps threshold around the OK 01919A (Balko) site location that was turned up after January 4 2018, but poor download speeds to the south, closer to the Perryton cell site. Because the test points show that service greatly improves the farther away from the Perryton cell site a test is conducted, the only logical reason for this area to be covered at or above 5 Mbps during the challenge process is that the OK 01919A (Balko) site was relied on when completing the January 4, 2018 4G LTE coverage map filed with the FCC.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, appearing to read "Lynn Merrill", written over a horizontal line.

Lynn Merrill

Executed on: December 26th, 2018

ATTACHMENT A – SAGEBRUSH SPEED TEST TABLE

Mobility Fund II MT, ND, WY (T-Mobile only) Submitted by Sagebrush Cellular, Inc.						
	MFII 400m Grid Cells			T-Mobile Download Speed Test Points		
	Total	< 75 percent covered	>= 75 percent covered	< 5 Mbps	>= 5 Mbps	Total Speed Tests
Driven	2,882	1,662	1,220	434,501	8,554	443,055
		57.67%	42.33%	98.07%	1.93%	
> 5 Mbps trimmed out	2,376	1,434	942			
		49.76%	32.69%			

NOTES:

- 1 All calculations are based on MRL mapping information.
- 2 All percentages are percentages of total tested grid cells or total speed tests.

ATTACHMENT B – PANHANDLE SPEED TEST TABLE

Mobility Fund II Oklahoma Panhandle (T-Mobile only)						
	MFII 400m Grid Cells			T-Mobile Download Speed Test Points		
	Total (of 5,901)	< 75 percent covered	>= 75 percent covered	< 5 Mbps	>= 5 Mbps	Total Speed Tests
Driven	5,587	1,788 32.00%	3,799 68.00%	1,222,385 98.10%	23,624 1.90%	1,246,009
> 5 Mbps trimmed out	4,422	1,544 27.64%	2,878 51.51%			

NOTES:

- 1 All calculations are based on MRL mapping information.
- 2 All percentages are percentages of total tested grid cells or total speed tests.

ATTACHMENT C – PINE BELT SPEED TEST TABLE

Mobility Fund II Pine Belt Coverage Area, Alabama (T-Mobile only) Submitted by Pine Belt Cellular, Inc.						
	MFII 400m Grid Cells			T-Mobile Download Speed Test Points		
	Total	< 75 percent covered	>= 75 percent covered	< 5 Mbps	>= 5 Mbps	Total Speed Tests
Driven	17,204	12,476	4,728	591,908	65,616	657,524
		72.52%	27.48%	90.02%	9.98%	
> 5 Mbps trimmed out	14,236	10,957	3,279			
		63.69%	19.06%			

NOTES:

- 1 All calculations are based on MRL mapping information.
- 2 All percentages are percentages of total tested grid cells or total speed tests.

DECLARATION OF MIKE KILGORE

I, Mike Kilgore, declare as follows:

1. My name is Mike Kilgore. I am over the age of 18 and competent to make this declaration. The statements in this declaration are true and within my personal knowledge.

2. I am the Chief Executive Officer for Nemont Telephone Cooperative, Inc. (“Nemont”) and its subsidiaries Project Telephone Company (“Project”), Missouri Valley Communications, Inc. (“MVC”), Nemont Communications, Inc. (“NCI”) and Sagebrush Cellular, Inc. (“Sagebrush”).

3. Sagebrush is a wholly-owned subsidiary of NCI. NCI is held jointly by Project and Nemont. Project is a wholly-owned subsidiary of Nemont. MVC is also a wholly-owned subsidiary of Nemont.

4. Sagebrush is a commercial mobile radio service (“CMRS”) provider offering service in northeast and south central Montana, as well as portions of North Dakota and Wyoming. Sagebrush covers over 17,000 square miles, the vast majority of which is rural and remote in nature, including the Crow and Fort Peck Indian Reservations.

5. I have been in the telecommunications business for over 30 years and have been involved in building and operating both wireline and wireless networks.

6. I participated in ex parte meetings as a member of the Rural Wireless Association, Inc. (“RWA”) at the Federal Communications Commission on December 6, 2018 in Washington, DC as evidenced by the ex parte filed on December 10, 2018.

7. In those meetings I stated that T-Mobile overstated its coverage in its Mobility Fund Phase II filings submitted in the USAC portal.

8. I based that statement on the results of our drive testing data that Sagebrush submitted pursuant to the FCC's MF II Challenge process and my firsthand knowledge of the available coverage throughout northeastern Montana.

9. During the MF-II challenge window, Sagebrush took speed tests in the area surrounding T-Mobile towers in both Glasgow, MT and Scobey, MT.

10. Upon reviewing the speed test data and noting the high number of points that tested below 5 Mbps download speed or did not register 4G LTE service at all, I questioned whether T-Mobile had sufficient backhaul to support the 5 Mbps download speeds it reported to the FCC in its January 4, 2018 MF II coverage filing.


11. Sagebrush management, who also serve as management of Sagebrush's affiliated telephone companies, reviewed each telephone company's circuit installation records to determine if circuits had been installed to support backhaul for T-Mobile's cell sites in northeastern Montana and Williston, North Dakota. Details concerning the location and timing of the installation of the circuits are subject to the FCC's Customer Proprietary Network Information (CPNI) rules and cannot be disclosed without the permission of the customer or at the request of the FCC or other government agency. Nemont will provide such information if requested by the FCC.

12. Sagebrush also conducted a review of the FCC's Universal Licensing System ("ULS") to determine if T-Mobile had sufficient backhaul capacity to support the claimed qualifying coverage as of January 4, 2018.

13. As evidenced by the photographs provided by, Jerry Tilley, our COO, and included in his separate Declaration, satellite backhaul facilities were the only backhaul facilities in place at these locations as of the January 4, 2018, deadline for submitting MF II coverage data.

14. In both the Scobey, Montana area and the Glasgow, Montana area where T-Mobile has claimed speeds of 5 Mbps download, T-Mobile did not have the backhaul facilities in place to support those speeds as of the January 4, 2018 deadline.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.


Michael Kilgore
Executed on: December 26th, 2018

DECLARATION OF JERRY TILLEY

I, Jerry Tilley, declare as follows:


1. My name is Jerry Tilley. I am over the age of 18 and competent to make this declaration.
The statements in this declaration are true and within my personal knowledge.
2. I am the Chief Operating Officer for Nemont Telephone Cooperative, Inc. ("Nemont") and its subsidiaries Project Telephone Company ("Project"), Missouri Valley Communications, Inc. ("MVC"), Nemont Communications, Inc. ("NCI") and Sagebrush Cellular, Inc. ("Sagebrush").
3. Sagebrush is a wholly-owned subsidiary of NCI. NCI is held jointly by Project and Nemont. Project is a wholly-owned subsidiary of Nemont. MVC is also a wholly-owned subsidiary of Nemont.
4. Sagebrush is a commercial mobile radio service ("CMRS") provider offering service in northeast and south central Montana, as well as portions of North Dakota and Wyoming. Sagebrush covers over 17,000 square miles, the vast majority of which is rural and remote in nature, including the Crow and Fort Peck Indian Reservations.
5. Members of my staff took the photographs in Attachments A-E to the Rural Wireless Association's Informal Request for Commission Action.
6. Attachment A contains four photographs of the same satellite backhaul facilities operated by T-Mobile in Scobey, Montana at the same physical location as its cell site. These photographs were taken December 19, 2018. T-Mobile's Scobey cell site can be easily viewed from our Scobey office. This cell site was installed within the past 18 months when T-Mobile was trying to meet its 700 MHz buildout deadline. There are currently no microwave facilities associated with this cell site nor have there ever been microwave

facilities associated with T-Mobile's Scobey cell site. Other than the satellite backhaul facilities depicted in these photographs, T-Mobile does not have any other type of backhaul facilities installed at this site. In order to obtain wireline backhaul facilities at the Scobey cell site, T-Mobile would need to directly or indirectly make a request of Nemont for the installation of a wireline circuit as Nemont is the only wireline local exchange carrier in the area capable of providing this circuit. Nemont does not provide (and has not provided) this service to T-Mobile at this location.

7. Attachment B consists of four photographs taken at T-Mobile's Glasgow, Montana cell site. Page B-1 contains photographs of the satellite backhaul facilities operated by T-Mobile in Glasgow, Montana. The top photograph was taken in February 2018 and the bottom photograph was taken in December 2018.
8. Page B-2 contains photographs of the monopole on which T-Mobile has installed its Radio Access Network equipment in Glasgow, Montana. Sagebrush has an office and employees in Glasgow and my staff and I are frequently in the area. T-Mobile installed a cell site in Glasgow in very early 2018 and we have monitored the ongoing activation process. The top photo was taken in February 2018 and shows that there are no microwave facilities mounted at the site. The bottom photo was taken in December 2018 and shows a microwave dish installed. Based on the photo taken in February 2018, at the time T-Mobile filed its MF II coverage data on January 4, 2018, it did not have any microwave backhaul facilities in place nor did it have a wireline circuit installed as that circuit would have to be installed by Sagebrush's affiliate, Nemont. Based on Nemont's install records, as of January 4, 2018, Nemont had not installed a circuit at this location.

9. Attachment F is a photograph of T-Mobile's Tampico cell site showing the satellite backhaul facilities in place. This photo was taken sometime in mid-January to mid-February, 2018. At the time the photo was taken there were no microwave backhaul facilities installed nor were there any wireline circuits installed. As there are no other wireline telephone companies operating in the area, a wireline circuit for this location would have to be installed by Nemont, if requested.
10. Attachment G is a photograph of T-Mobile's Frazer, Montana cell site showing the satellite backhaul facilities in place. This photo was taken sometime in mid-January to mid-February, 2018. At the time the photo was taken there were no microwave backhaul facilities installed nor were there any wireline circuits installed. As there are no other wireline telephone companies operating in the area, a wireline circuit for this location would have to be installed by Nemont, if requested.
11. Attachment H is a photograph of T-Mobile's West Lustre, Montana cell site showing the satellite backhaul facilities in place. This photo was taken sometime in mid-January to mid-February, 2018. At the time the photo was taken there were no microwave backhaul facilities installed nor were there any wireline circuits installed. As there are no other wireline telephone companies operating in the area, a wireline circuit for this location would have to be installed by Nemont, if requested.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.


Jerry Tilley
Executed on: December 26th, 2018

ATTACHMENT A – SCOBEE





ATTACHMENT B – GLASGOW



This February 2018 photo shows T-Mobile's equipment mounted on an h-frame with a satellite dish mounted on top.



This December 2018 photo shows the same T-Mobile site with the satellite dish removed.



This February 2018 photo shows the T-Mobile monopole site without any microwave installed.



This December 2018 photo shows the same T-Mobile monopole site with a microwave dish mounted.

ATTACHMENT C – TAMPICO



ATTACHMENT D – FRAZER



ATTACHMENT E – WEST LUSTRE



DECLARATION OF REMI SUN

I, Remi Sun, declare as follows:

1. My name is Remi Sun. I am over the age of 18 and competent to make this declaration.

The statements in this declaration are true and within my personal knowledge.

2. I am the Chief Financial Officer for Nemont Telephone Cooperative, Inc. ("Nemont") and its subsidiaries Project Telephone Company ("Project"), Missouri Valley Communications, Inc. ("MVC"), Nemont Communications, Inc. ("NCI") and Sagebrush Cellular, Inc. ("Sagebrush").

3. Sagebrush is a wholly-owned subsidiary of NCI. NCI is held jointly by Project and Nemont. Project is a wholly-owned subsidiary of Nemont. MVC is also a wholly-owned subsidiary of Nemont.

4. Sagebrush is a commercial mobile radio service ("CMRS") provider offering service in northeast and south central Montana, as well as portions of North Dakota and Wyoming. Sagebrush covers over 17,000 square miles, the vast majority of which is rural and remote in nature, including the Crow and Fort Peck Indian Reservations.

5. I participated in ex parte meetings as a member of the Rural Wireless Association, Inc. ("RWA") at the Federal Communications Commission on December 6, 2018 in Washington, DC as documented by the ex parte filed on December 10, 2018.

6. In those meetings I stated that it in some cases it appeared that T-Mobile projected its future coverage in its Mobility Fund Phase II filings submitted in the USAC portal instead of its actual coverage as of January 4, 2018.

7. I based that statement on the results of drive testing data that Sagebrush developed and submitted pursuant to the FCC's MF II Challenge process and information related to the timing

of Nemont's installation of circuits used at T-Mobile cell sites in the area where it claimed to have download speeds of 5 Mbps. The circuits for some of these towers, including Glasgow, were installed by Nemont after January 4, 2018.

8. Details concerning the location and timing of the installation of the circuits are subject to the FCC's Customer Proprietary Network Information (CPNI) rules and cannot be disclosed without the permission of the customer or at the request of the FCC or other government agency. Nemont will provide such information if requested by the FCC.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Remi Sun
Executed on: December 26th, 2018

DECLARATION OF JANA WALLACE

I, Jana Wallace, declare as follows:

1. My name is Jana Wallace. I am over the age of 18 and competent to make this declaration. The statements in this declaration are true and within my personal knowledge.
2. I am the Chief Operations Officer for Panhandle Telephone Cooperative Inc. ("PTCI") and Panhandle Telecommunication Systems, Inc. ("PTSI").
3. PTSI is a wholly-owned subsidiary of PTCI.
4. I participated in ex parte meetings as a member of the Rural Wireless Association, Inc. ("RWA") at the Federal Communications Commission on December 6, 2018 in Washington, DC as documented by the RWA ex parte filed on December 10, 2018.
5. In those meetings I stated that T-Mobile overstated its coverage in its Mobility Fund Phase II filings submitted in the USAC portal. I based that statement on the results of drive testing data that PTSI submitted pursuant to the FCC's MFII Challenge process, my firsthand knowledge of the available coverage throughout the Oklahoma Panhandle, and information related to the timing of PTCI's installation of circuits for T-Mobile cell sites in the area where T-Mobile claimed to have 5 Mbps download speeds. Most of the circuits for these towers were installed by PTCI after the January 4, 2018 deadline.
6. In those meetings, I also reported that, over the course of the drive testing process, PTSI saw qualifying 4G LTE T-Mobile coverage become available in places later in the testing period where it was not available earlier during the testing period and where T-Mobile had claimed in its January 4, 2018 filing of MFII coverage maps that qualifying coverage existed. I based that statement on the results of drive testing data that PTSI submitted pursuant to the FCC's MFII

Challenge process and my firsthand knowledge of the available coverage throughout the Oklahoma Panhandle.

7. Details concerning the location and timing of the installation of the circuits by PTCI are subject to the FCC's Customer Proprietary Network Information (CPNI) rules and cannot be disclosed without the permission of the customer or at the request of the FCC or other government agency. PTCI will provide such information if requested by the FCC.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, reading "Jana Wallace", written over a horizontal line.

Jana Wallace

Executed on: December 26th, 2018

DECLARATION OF JOHN C. NETTLES

I, John C. Nettles, declare as follows:

1. My name is John Nettles. I am over the age of 18 and competent to make this declaration.

The statements in this declaration are true and within my personal knowledge.

2. I am the President of Pine Belt Communications Inc., (“PBC”), Pine Belt Telephone Company, Inc. (“Pine Belt”) and Pine Belt Cellular, Inc. (“Pine Belt Cellular”).

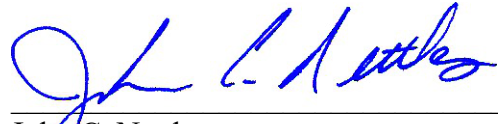
3. Pine Belt Cellular is a wholly-owned subsidiary of PBC and provides mobile telephone, SMS, and wireless broadband services in the Alabama counties of Choctaw, Dallas, Marengo, Perry and Wilcox.

4. I participated in ex parte meetings as a member of the Rural Wireless Association, Inc. (“RWA”) at the Federal Communications Commission on December 6, 2018 in Washington, DC as evidenced by the ex parte filed on December 10, 2018.

5. In those meetings I stated that T-Mobile overstated its coverage in its Mobility Fund Phase II filings submitted in the USAC portal.

6. I based that statement on the results of drive testing data that Pine Belt Cellular submitted pursuant to the FCC’s MFII Challenge process and my firsthand knowledge of the available coverage throughout the Black Belt region of Alabama.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



John C. Nettles
Executed on: December 26th, 2018