

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Updating Part 1 Competitive Bidding Rules)	WT Docket No. 14-170
)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions)	GN Docket No. 12-268
)	
Petition of DIRECTV Group, Inc. and EchoStar LLC for Expedited Rulemaking to Amend Section 1.2105(a)(2)(xi) and 1.2106(a) of the Commission's Rules and/or for Interim Conditional Waiver)	RM-11395
)	
Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission's Competitive Bidding Rules and Procedures)	WT Docket No. 05-211
)	

REPLY COMMENTS OF THE BLOOSTON RURAL CARRIERS

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Summary

The record in this proceeding – and results of the recently-concluded AWS-3 auction (Auction 97) – demonstrate that rural telephone companies as a class of Designated Entities (“DEs”) are not being adequately served by the Commission’s current DE program. Instead, the record shows that a majority of licenses are being won by nationwide carriers and “Special Purpose DEs” that are able to compete in bidding against nationwide carriers, but which compromise the benefits of the Commission’s DE program to the detriment of rural telephone companies.

To restore this imbalance, rural commenters urge the Commission to offer a 25% bidding credit to all rural telephone company bidders. This new bidding credit should be independent of any small business bidding credit for which a rural telephone company bidder may be eligible, and the credits should be cumulative. At the same time, rural commenters agree that bid credits alone are no “silver bullet” for rural telcos that seek to compete in auctions. The FCC should therefore consider adopting further mechanisms to help rural carriers obtain spectrum in and adjacent to their current service territories, such as rural partitioning incentives. Such a mechanism would help rural telcos overcome barriers arising from the Commission’s decision to use Partial Economic Areas (PEAs) rather than smaller Cellular Market Areas (CMAs) for the forward licensing of the 600 MHz band.

Rural commenters also urge the Commission to proceed with caution with respect to adopting modifications to the AMR rule. The rule substantially limits DE business flexibility, but at the same time, relaxation or elimination of the rule may open the door to further abuse of the DE program. The Commission should modify the AMR rule to clarify that DEs may freely enter into spectrum leasing and other “material relationships” with one another, and it should continue (and strengthen) its prohibition against DEs entering into material relationships with larger carriers. The Commission can safely eliminate its DE annual reporting requirement as it proposed, and it should retain its existing five-year unjust enrichment repayment schedule.

The recently-concluded AWS-3 auction was far from a success for most DEs and especially for rural telephone companies and rural telco affiliates. The Commission has statutory obligation under Section 309(j) of the Communications Act to help rural telcos and legitimate

small businesses and entrepreneurs to have a meaningful opportunity to participate in auctions and to participate in the provision of wireless services. This is especially true with respect to the 600 MHz band spectrum, which is well suited for the provision of service in rural areas. The Commission should modify its rules to provide rural telephone carriers with a meaningful opportunity to compete and reject proposals that seek to impose additional limitations and regulatory burdens on rural telephone companies and other legitimate Des, since this would only marginalize these entities even more than they are now.

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REPLY COMMENTS OF THE BLOOSTON RURAL CARRIERS

The law firm of Blooston Mordkofsky Dickens Duffy & Prendergast, LLP (“Blooston”), on behalf of its rural telephone and rural wireless clients shown in Attachment A (the “Blooston Rural Carriers”), respectfully submits these reply in the above-captioned proceeding.¹ As discussed below, the record in this proceeding supports implementation of a rural telephone bid credit, partitioning incentives and other measures to help ensure meaningful rural participation in upcoming auctions. At the same time, multiple commenters have bolstered the Blooston Rural Carriers’ showing that the Commission should modify the Attributable Material Relationship

¹ The list of supporting Blooston Rural Carriers in Attachment A has been expanded to include: Citizens Telephone Company of Higginsville, MO; Delcambre Telephone Company LLC of Delcambre, LA; Midstate Communications, Inc. of Kimball, SD; Star Telephone Company of Maringouin, LA; the South Dakota Telecommunications Association (“SDTA”) of Pierre, SD and Triangle Communication System, Inc. of Havre, MT. These companies and SDTA member companies also support the initial comments of the Blooston Rural Carriers in this proceeding.

(AMR) rule to facilitate bona fide arrangements among small businesses and/or rural telephone companies, while bolstering the rule to keep bid credits out of the hands of nationwide service providers. As discussed below, the Blooston Rural Carriers have concerns about other proposals offered by non-DEs that will make it more difficult for small and rural carriers to compete.

I. Comments Support the Creation of a Rural Telephone Bidding Credit and Further Measures to Ensure that Rural Telephone Companies Can Obtain 600 MHz Licenses in the Broadcast Incentive Auction

The record in this proceeding – and results of the recently-concluded AWS-3 auction (Auction 97) – demonstrate that rural telephone companies as a class of Designated Entities (“DEs”) are not being adequately served by the Commission’s current DE program. Despite the eager participation by dozens of rural telephone companies and rural telco affiliates in recent auctions, and availability of small bidding credits to some rural telephone company bidders, only a few have been fortunate enough to win licenses, and success has come at a steep cost because most rural telco winning bidders were too large to qualify for small business status. Instead, the record shows that a majority of licenses are being won by nationwide carriers and “Special Purpose DEs” that are able to compete in bidding against nationwide carriers, but which compromise the benefits of the Commission’s DE program to the detriment of rural telephone companies.

To restore this imbalance, a consensus has emerged among the Blooston Rural Carriers, NTCA – The Rural Broadband Association (“NTCA”) and the Rural Wireless Association, Inc. (“RWA”), proposing that the Commission offer a 25% bidding credit – equal to the average credit available to small businesses – to all rural telephone company bidders.² This new bidding

² See Comments of Blooston Rural Carriers, *filed* February 20, 2015 (Blooston Comments) at pp. 8-11; Comments of NTCA – The Rural Broadband Association, *filed* February 20, 2015 (NTCA Comments) at pp. 2-4; Comments of Rural Wireless Association, Inc., *filed* February 20, 2015 (RWA Comments) at pp. 3-5.

credit should be independent of any small business bidding credit for which a rural telephone company bidder may be eligible, and the credits should be cumulative.³ Allowing the rural telephone credit to be cumulative with any small business bid credit is appropriate because rural telephone companies serve primarily sparsely-populated and less profitable areas that other carriers choose to ignore. Adopting a separate and targeted accommodation for rural telephone companies would recognize this commitment and, as NTCA observes, go a long way towards enabling these carriers to compete at auction against larger, deep-pocketed bidders.⁴ The Blooston Rural Carriers agree that there is a strong statutory foundation for adoption of a rural telephone company bidding credit – since they are an existing category of DEs - and there is no textual basis in the Communications Act to suggest that rural telephone companies must also be small businesses in order to be eligible for bidding credits.⁵

While there is certainly merit to offering bidding credits based on alternative public interest criteria, such as the number of employees or number of years of providing service to rural areas, the Blooston Rural Carriers strongly prefer a straightforward and substantial (i.e., at least 25%) bidding credit that is based on rural telco status. This would be far easier for the Commission to create using existing statutory definitions and Part 1 rules; it would be easy for the industry and investors to understand (encouraging more rural telco auction participants); and it would be easier for the Commission's staff to administer. Similarly, CCA's proposal for cumulative bidding credits based on the provision of service to unserved or underserved areas⁶ may seek to promote laudable public policy goals, but the Blooston Rural Carriers fear it would

³ *Id.*

⁴ NTCA Comments at p. 3.

⁵ RWA Comments at pp. 4-5.

⁶ Comments of Competitive Carriers Association filed February 20, 2015 (CCA Comments) at p. 8.

be too difficult for the Commission to administer in the context of the Broadcast Incentive Auction. It would also potentially frustrate or become confused with the policy goals underpinning the Commission's Mobility Fund. Modification of the Commission's DE rules should create an avenue for getting valuable 600 MHz spectrum into the hands of rural carriers and allowing them the flexibility to secure financing and enter into DE inter-carrier relationships necessary to develop sustainable businesses. Service to unserved and underserved communities will follow if the Commission refrains from using its DE rules to impose undue restrictions on rural telephone company business arrangements.

Rural commenters also unanimously agree that bid credits alone are no "silver bullet" for rural telcos that seek to compete in spectrum auctions. The Commission should seriously consider other mechanisms to help rural carriers obtain spectrum in and adjacent to their current service territories.⁷ The larger Partial Economic Area (or PEA) service areas that the Commission has adopted for the forward licensing of 600 MHz licenses in the Broadcast Incentive Auction will raise costs and make it more difficult for smaller rural telcos to obtain licenses for their service areas. Thus, the Blooston Rural Carriers continue to believe that rural partitioning incentives, such as proposed in their initial comments,⁸ would provide another avenue for rural carriers to obtain licenses for smaller (and irregular-shaped) geographic areas that correspond to their existing wireless and wireline service territories.

⁷ NTCA Comments at p.4; RWA Comments at p. 2.

⁸ Blooston Comments at pp. 11-12.

II. The Commission Should Increase the Size of Small Business Eligibility Tiers but Be Wary of Increasing Small Business Bidding Credits Without Meaningful Restrictions on “Special Purpose DEs”

In addition to adopting a rural telephone bidding credit, commenters who addressed the issue unanimously supported the Commission’s proposal to increase the small business gross revenue thresholds based on a 36.4% increase in the U.S. Gross Domestic price index between 1997 and 2013.⁹ The fact that no commenters objected to the Commission’s proposal and nobody argued that this proposal was unreasonable or contrary to the public interest suggests it is non-controversial, and the Commission should adopt the revised size standards as proposed. As another matter related to small business bidding credits, a number of other commenters have urged the Commission to expand the size of the small business bidding credits to a level of at least 40%.¹⁰ The Blooston Rural Carriers agree that increasing the amount and availability of bidding credits would help to ensure that licenses are disseminated among a wider variety of applicants. However, any increase in the level of small businesses bidding credits must also be accompanied by strict limits on the ability of nationwide and regional carriers using “Special Purpose DEs” to overwhelmingly dominate an auction, such as the DISH-backed DEs did in Auction 97. Moreover, it is more important to establish a focused rural telephone company bidding credit aside from any increase in the small business credit, since this will ensure that the benefits of the DE program are used by legitimate DEs and not by “small businesses” that are bidding on a nationwide scale.

Clarifying that rural telephone companies are not required to count a cellular partnership’s gross revenues as their own if a dominant nationwide or regional provider has been

⁹ Blooston Comments at p. 8; RWA Comments at p. 8; CCA Comments at p. 7; Comments of the Auction Reform Coalition *filed* February 20, 2015 (ARC Comments) at pp. 21-22).

¹⁰ Comments of the DE Opportunity Coalition *filed* February 23, 2015 (DE Opportunity Coalition Comments) at pp. 33-35; Comments of King Street Wireless, LP *filed* February 20, 2015 (King Street Comments) at pp. 1-2, 4.

given plenary authority to manage day-to-day affairs would be another step in the right direction, to ensure that rural telephone companies that have valuable experience in the provision of wireless services are not prevented from being able to utilize a maximum level of bidding credits.

III. While Comments are Divided on Whether the Commission Should Eliminate or Strengthen the AMR Rule, it is Clear that Protections Must Be Adopted to Prevent Special Purpose DEs from Dominating Future Auctions

Comments in this proceeding are divided on whether the Commission should eliminate or strengthen the AMR rule. On the one hand, small businesses and rural telephone companies could benefit from greater flexibility in the Commission's DE rules and adoption of the proposed two-pronged standard for evaluating small business eligibility. This test would have the Commission determine whether: (1) an applicant meets the applicable small business size standard, and (2) whether it retains control over the spectrum associated with the licenses for which it seeks small business benefits. On the other hand, many commenters are justifiably concerned about the possibility that any relaxation of the AMR rule may open the door to further abuse of the DE program.¹¹ Because commenters on both sides of the issue raise legitimate concerns, the Commission will need to proceed with caution with respect to modifications to the AMR rule.¹² However, there are certain modifications to the Commission's AMR rule and DE program that the Commission should implement without delay. These are discussed below.

a. It is Safe to Eliminate Leasing and Other "Material Relationship" Restrictions in the Context of Bona Fide DE-to-DE Transactions

Since its inception, the Blooston Rural Carriers have urged the Commission to modify its AMR rule because it was overbroad and prevented bona fide arrangements among small

¹¹ Comments of the Taxpayer Protection Alliance *filed* February 20, 2015 (TPA Comments);

¹² Blooston Comments at pp. 5-7; RWA Comments at pp. 13-15; NTCA Comments at p. 2.

businesses and/or rural telephone companies, without penalty.¹³ As currently written, the AMR rule discourages DEs from entering into spectrum leasing arrangements with one another even though this type of transaction may provide a ready source of capital, is a way to put spectrum in the hands of entities that value it the most and are in a position to put it to use more quickly, and raises no threat of unjust enrichment. Indeed, the only way for small and rural carriers to have any hope of success when competing against giant nationwide carriers is to have the ability to work with one another, free from regulatory restrictions that are aimed at preventing large companies from unjustly garnering the benefit of DE bidding credits.

Comments of NTCA and RWA echo this sentiment. In particular, NTCA has also observed that “[t]he current AMR rule is overly broad and prevents small wireless providers from being able to enter into leasing and other arrangements that help them secure the financing necessary to build wireless networks and provide wireless services to rural communities.”¹⁴ Comments of RWA agree that the new DE rules were “overbroad, restrictive, and had the unintended effect of harming the small and rural businesses that they were meant to help.”¹⁵

The Blooston Rural Carriers urge the Commission to narrow the AMR rule to clarify that DEs may freely enter into spectrum leasing and other “material relationships” with one another, but to continue (and strengthen) its prohibition against DEs entering into material relationships with larger carriers. Even sharp critics of the Commission’s DE program seem to understand the difference between allowing DEs to enter into leasing and other material relationships with one another (which carries no risk) and material relationships between DEs and large carriers (which

¹³ See Petition for Partial Reconsideration and/or Clarification, Blooston, Mordkofsky, Dickers, Duffy & Prendergast, LLP, WT Docket No. 05-211, filed June 2, 2006 (*Blooston Petition*); Reply to Opposition to Petitions for Reconsideration, Blooston, filed July 24, 2006 (*Blooston Reply*).

¹⁴ NTCA Comments at p. 5.

¹⁵ RWA Comments at p. 14.

harm legitimate DEs and threaten the integrity of the Commission’s DE program). In this regard, the Taxpayer Protection Alliance comments urge the Commission to “[retract] the discount on spectrum if a DE leases a significant portion of its asset to a larger company.” (*emphasis added*).

In light of the significant and immediate benefits that would come with modifying the AMR Rule as proposed herein, the Blooston Rural Carriers urge the Commission to clarify without delay that the current AMR rule will no longer prevent spectrum leasing and other material relationships between rural telephone companies and other *bona fide* DEs. Such action would create meaningful opportunities for small service providers that wish to work together

b. It is Safe to Eliminate the DE Annual Reporting Requirement

As a related matter, the Blooston Rural Carriers and RWA believe it is safe for the Commission to eliminate the DE annual reporting requirement, as it has proposed in the NPRM. This is a small but meaningful step that would reduce regulatory burdens and associated legal/consultant costs associated with a filing that has little informational value to the Commission.¹⁶

Commenters that urge the Commission to retain the DE reporting requirement do so because they apparently view the report as an effective means for providing “checks and balances” on the DE program.¹⁷ The Blooston Rural Carriers respectfully disagree with any suggestion that the DE annual report is a strong enforcement tool, or should serve as a substitute for substantive rules that prevent the unjust enrichment of nationwide carriers and “Special Purpose DEs” that only exist because of their support. Annual reports to date have not served as

¹⁶ Blooston Comments at p. 11; RWA Comments at p. 11.

¹⁷ DE Opportunity Coalition Comments at pp. 37-38; T-Mobile Comments at p. 14.

a deterrent to entities that seek to exploit loopholes in the rules, and they only impose burdens and expense upon rural carriers and legitimate small businesses that must conserve their limited resources for the provision of service to subscribers.

c. It is Safe for the Commission to Retain its Existing Five-Year Unjust Enrichment Repayment Schedule

A diverse group of commenters, including DEs and competitive carriers, have urged the Commission to retain its five-year unjust enrichment period.¹⁸ The record in this proceeding, and firsthand experience of the Blooston Rural Carriers and other DEs has shown that a ten-year unjust enrichment restriction can be a significant impediment for small businesses and rural service providers to access capital and attract the financing necessary to participate in spectrum auctions and thereafter buildout their wireless networks. T-Mobile urges the Commission to require full repayment of the bidding credit, plus interest, throughout the entire ten-year license term in addition to a penalty equal to the sales price above and beyond the auction bid price, plus interest.¹⁹ However, the Blooston Rural Carriers fear that this will punish rural telephone companies and legitimate small businesses that need to reshuffle their spectrum holdings through transactions as they reach hard decisions on technology deployment and related matters.

IV. The Commission Should Reject Certain T-Mobile Proposals to “Strengthen” the DE Program, and Modify Others.

T-Mobile urges the FCC to adopt a requirement in addition to its existing anti-collusion rules that individuals or entities listed as disclosable interest-holders on more than one short-form application certify that they are not, and will not be, privy to, or involved in, the bidding

¹⁸ RWA Comments at pp. 9-11; DE Opportunity Coalition Comments at pp. 26-32; CCA Comments at p. 10.

¹⁹ *Id.* at pp. 14-15

strategy of more than one auction participant.²⁰ The Blooston Rural Carriers do not oppose this concept as a way to prevent some of the maneuvering by certain entities that contributed to a domination of bid credits in Auction 97 by Special Purpose DEs. However, it is respectfully submitted that this proposed requirement must be limited in scope to apply to “competing applicants.” There may be legitimate circumstances in which a person or entity holds and interest in two or more applicants that will not be competing against each other.

T-Mobile also believes the Commission should require that authorized bidders on a short-form application be unique to that applicant—meaning that an individual should be prohibited from serving as an authorized bidder for more than one auction participant.²¹ Again, this proposed restriction is too broad. Not being able to rely on a limited pool of experienced auction consultants could prevent many small businesses and rural telephone companies from being able to participate in the broadcast incentive auction. Existing FCC policies and rules – such as the prohibition of certain communications under Section 1.2105(c) - prohibit competing applicants that do not have pre-auction agreements from having common bidders. The Blooston Rural Carriers agree with commenters who believe the Commission should take steps to curb abusive bidding practices that are alleged to have taken place in Auction 97.²² At the same time, however, the Commission must be careful not to adopt restrictions that are overly broad and limit the ability of small businesses and rural telephone companies to rely on counsel and consultants when participating in future auctions.

²⁰ Comments of T-Mobile USA, Inc., filed February 20, 2015 (T-Mobile Comments) at p. 9.

²¹ *Id.*

²² Comments of T-Mobile at pp. 6-10; February 27, 2015 *Ex Parte* Letter of Tamara Preiss, VP Federal Regulatory Affairs, Verizon (arguing that “[t]he bidding data suggest that DISH and its DEs engaged in concerted conduct that went beyond the activity that occurs during typical bidding agreements or bidding consortia” and that “[t]hese same data raise questions as to whether the small business owners of Northstar and SNR exercised requisite *de facto* control or whether, instead, the bidding was centrally coordinated and controlled by DISH.”)

With respect to the DE program, T-Mobile believes the FCC should preserve and strengthen the AMR rule to prohibit designated entities from leasing more than 25% of their spectrum in the aggregate, across one or more lessees.²³ The Blooston Rural Carriers agree that restrictions are necessary for preventing the use of lease arrangements as an end around for large entities to garner bid credits through relationships with Special Interest DEs. However, the Blooston Rural Carriers propose an exception for lease arrangements between and among rural telcos and other DEs, as discussed above²⁴ and in their initial comments.²⁵ Any restrictions on spectrum leasing for DEs must not hamper business relationships that do not pose a threat of unjust enrichment and are otherwise in the public interest.

T-Mobile believes the Commission should require DE's to show "some level of build-out activity" consistent with the provision of timely, facilities-based service.²⁶ It has also requested that the Commission adopt a rebuttable presumption that equity investments of 50 percent or more constitute *de facto* control for purposes of attribution rules and 25% minimum equity requirement for controlling DEs.²⁷ While the Blooston Rural Carriers agree with the goal of deterring large carriers from exercising dominion over "Special Purpose DEs" through substantial control of their purse strings, these bright-line proposals must be refined or they will eliminate business flexibility for legitimate DEs, deter capital formation for small businesses, and deter auction participation by rural telephone companies and other DEs. For wireless bands that are newly allocated for the provision of fixed and mobile wireless services, like the 600

²³ *Id.* at pp. 13-14

²⁴ *Infra* at pp. 6-8.

²⁵ Blooston Comments at p. 7.

²⁶ T-Mobile Comments at pp. 14-15

²⁷ *Id.* at p. 15.

MHz band, it may take a number of years for equipment standards to be developed and finalized, and for affordable network equipment and consumer devices to become generally available in the marketplace for small and rural service providers. Requiring DEs (and DEs only) to demonstrate “build-out activity within one year” under these circumstances would be counterproductive, much like the DE annual reporting requirement that the Commission has proposed to eliminate. Such a requirement would impose disproportional burdens on legitimate small businesses and rural carriers, while Special Purpose DEs would have a comparatively easy time showing build-out activity backed by the resources of an incumbent service provider or deep-pocketed investor.

With regard to T-Mobile’s proposal to deem a 50% equity interest to be controlling regardless of voting rights, the immediate concern of the Blooston Rural Carriers is that this restriction should not prevent partnerships or LLCs made up of bona fide rural telephone companies as investors, with one company empowered as the managing member. Therefore, the Blooston Rural Carriers would want language clarifying that these joint efforts among legitimate DEs could continue.

T-Mobile urges the Commission not to adopt auction rules that limit the ability of those who need spectrum—and who lack the deep pockets of the largest two nationwide providers—to be able to acquire it or put it to use.²⁸ “For companies like T-Mobile that lack the vast resources of its larger competitors, joint bidding arrangements can serve as a means of bolstering purchasing power and scale to achieve more extensive network expansion and upgrades that are necessary to compete successfully in the wireless industry.” In a similar vein, small businesses and rural telephone companies must be permitted under the Commission’s DE rules to lease their

²⁸ *Id.* at p. 18.

spectrum freely to affiliates, other DEs, and similar circumstances that don't involve passing DE benefits to entities that aren't eligible for such benefits.

In sum, T-Mobile's proposed restrictions on DE flexibility must be modified to the extent that they would marginalize legitimate small businesses, minority- and women-owned businesses, and rural telephone companies even more than they are now.

V. The AWS-3 Auction Should Not Be Viewed as a "Success" for all DEs

In its comments, the DE Opportunity Coalition appears to equate DE success in FCC auction with the concept of "overall spectrum dollar value."²⁹ However, this is not the case for all DEs, and especially not for most rural telephone companies, whose primary interest is in obtaining spectrum to serve their rural customers, not necessarily obtaining high dollar value licenses. Table 1 of the DE Opportunity Coalition's comments illustrates the disappointing fact that rural telephone companies have had no success in recent auction when compared to nationwide carriers or other types of DE bidders. This raises the very real question as to whether the Commission is meeting its obligations to rural telephone companies under Section 309(j) of the Communications Act.

Allowing a handful of "Special Purpose DEs" to dominate auctions backed by billions of dollars of investment from nationwide service providers, and allowing publicly-traded entities to secure billions of dollars in bidding credits for spectrum that they exclusively use in their own networks, is respectfully not the type of participation in auctions and provision of wireless telecommunications services that Congress envisioned for DEs when it enacted Section 309(j) of the Communications Act.

²⁹ DE Opportunity Coalition Comments at pp.7-8, Note 21.

The DE Opportunity Coalition’s figures further demonstrate that rural telephone companies are garnering no benefit from the Commission’s DE program and that the Commission is failing to meet its statutory obligations to rural telephone companies, more than any other group, under Section 309(j). The Blooston Rural Carriers agree with their observation that “more needs to be done to truly unleash robust participation for all types of DEs, especially rural telcos and smaller DEs.”³⁰

Finally, with respect to the tremendous revenues generated by the AWS-3 auction, comments from the DE Opportunity Coalition argue that Auction 97 DE bidding credits “helped ramp up competition for the spectrum, and those bidding credits were *dwarfed* by the additional bid amounts generated.” It is not at all clear that this is the case, as DISH would likely have placed a similar level of bids in its own name if it had been prohibited from bidding through the Special Purpose DEs that it utilized. Moreover, the Blooston Rural Carriers take serious issue with any claim that “success” of the DE program can or should be measured in terms of generating greater auction revenues. The whole point of the DE program, as stated in Section 309(j) of the Communications Act, is to promote participation (and success) in auctions by a broad range of Designated Entities, and thereafter in the provision of wireless services. By that measure (which the Blooston Rural Carriers respectfully submit was the intent of Congress all along), the Commission’s DE program is coming up woefully short.

³⁰ *Id.* at p. 9.

CONCLUSION

The Blooston Rural Carriers respectfully request that the Part I competitive bidding rules be modified as described above, in order to provide rural telephone carriers with a meaningful opportunity to participate in spectrum auctions and the provision of important wireless services to their rural subscribers.

Respectfully submitted,

THE BLOOSTON RURAL CARRIERS



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Their Counsel

Dated: March 6, 2015

Blooston Rural Carriers

All West Communications, Inc.....	Kamas, UT
BEK Communications Cooperative.....	Steele, ND
Breda Telephone Corp.	Breda, IA
Butler-Bremer Communications.....	Plainfield, IA
Choctaw Telephone Co.....	Halltown, MO
*Citizens Telephone Company.....	Higginsville, MO
Custer Telephone Cooperative, Inc.....	Challis, ID
*Delcambre Telephone Company LLC.....	Delcambre, LA
Dumont Telephone Company.....	Dumont, IA
Electra Telephone Co.....	Electra, TX
Emery Telcom-Wireless, Inc.	Orangeville, UT
FMTC Wireless, Inc.....	Nora Springs, IA
Golden West Telecommunications Cooperative, Inc.	Wall, SD
Haxtun Telephone Co.	Haxtun, CO
Jefferson Telephone Company.....	Jefferson, IA
Kennebec Telephone Company.....	Kennebec, SD
Ligonier Telephone Company, Inc.	Ligonier, IN
Marne & Elk Horn Telephone Co.....	Elk Horn, IA
*Midstate Communications, Inc.	Kimball, SD
MoKan Dial, Inc.	Louisburg, KS
Northeast Florida Telephone.....	Macclenny, FL
Peñasco Valley Telephone Cooperative.....	Artesia, NM
Polar Communications Mutual Aid Corporation.....	Park River, ND
Pymatuning Independent Telephone Company.....	Greenville, PA
Silver Star Telephone Company, Inc.....	Freedom, WY
Smithville Telephone Company, Inc.	Ellettsville, IN
*Star Telephone Company.....	Maringouin, LA
*South Dakota Telecommunications Association.....	Pierre, SD
Tatum Telephone Co.....	Tatum, TX
*Triangle Communication System, Inc.	Havre, MT
Uintah Basin Electronic Telecommunications, LLC	
d/b/a Strata Networks.....	Roosevelt, UT

ATTACHMENT A

Venture Communications Cooperative, Inc..... Highmore, SD
Walnut Hill Telephone Co..... Lewisville, AR
Webster-Calhoun Cooperative Telephone Association Gowrie, IA
Whidbey Telephone CompanyLangley, WA
Winnebago Cooperative Telecom Association.....Lake Mills, IA

* (denotes companies that have joined the Blooston Rural Carriers after the initial comment deadline)