



August 26, 2015

Via ECFS

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

RE: EX PARTE PRESENTATION

WT Docket No. 10-208: *Universal Service Reform – Mobility Fund*

WC Docket No. 10-90: *Connect America Fund*

Dear Ms. Dortch,

On August 25, 2015, I had a telephone conversation with Louis Peraertz, Senior Legal Advisor to Commissioner Mignon Clyburn, to discuss the Rural Wireless Association, Inc.'s ("RWA") involvement and interest in the implementation of Mobility Fund Phase II. RWA expressed its continued view that the FCC should follow through on its commitment to rural Americans by implementing a second phase of the Mobility Fund. There is a need for ongoing support for expanding and sustaining 4G LTE mobile services in high-cost areas where there is no business case for deployment by unsubsidized carriers. Further, the FCC should size the annual budget for Mobility Fund Phase II at \$500 million as originally proposed, in order to ensure that all rural and remote areas that truly need support are able to receive it. Additionally, to provide certainty, frozen legacy support should not be further phased down until Mobility Fund Phase II funds are substantially disbursed.¹

RWA also discussed a point made in two previous filings by rural carriers regarding Mobility Fund Phase II.² Both filings cautioned against eliminating universal service support in areas where either AT&T or Verizon provides 4G LTE service because of the current incompatibility between CDMA and GSM networks due to band class differences and carriers'

¹ See Comments of the Rural Wireless Association, Inc., *In the Matter of Connect America Fund; Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, WT Docket No. 10-208 (Aug. 8, 2014).

² Notice of *Ex Parte* Presentation of Panhandle Telephone Cooperative, Inc.; WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51; WT Docket No. 10-208 (Dec. 17, 2014). See also Notice of *Ex Parte* Presentation of Rural Telcos; WT Docket Nos. 14-170, 10-208, 05-211; GN Docket No. 12-268 (April 23, 2015).

continuing need to rely on 3G or 2G networks for voice/text services. The filings noted that VoLTE rollout continues to be slow-going and will not be truly universal until all handsets are fully VoLTE compatible across all networks. As such, there remains a need to ensure the continued availability of both CDMA and GSM networks well into the foreseeable future so that all Americans have universal access to critical voice services.

RWA agrees with these rural carriers, and shares their concerns about the possibility of declining voice service access and its implications on public safety. The FCC should not eliminate Mobility Phase II support in areas where just one of AT&T or Verizon provides 4G LTE service. Circuit-switched voice services, even on Verizon or AT&T 4G LTE networks, are subject to CDMA / GSM incompatibilities now and will be well into the foreseeable future. Universal access to voice service remains essential, particularly for emergency 911 calls and other emergency communications services. Indeed, even the U.S. Department of Homeland Security has recognized that because Wireless Priority Service (“WPS”) capabilities currently exist on 2G/3G networks, the transition to VoLTE may have an impact on WPS subscribers that will be carrier-specific.³

RWA looks forward to its continued work with Commissioners and staff on Mobility Fund Phase II issues. Ongoing support is needed to help expand essential wireless coverage in rural and remote areas, upgrade existing rural wireless networks to 4G LTE speeds, and keep rural areas on the path to 5G and next generations of mobile broadband services.

Pursuant to Section 1.1206 of the Commission’s Rules, 47 C.F.R. § 1.1206, this *ex parte* presentation is being filed electronically with the Office of the Secretary.

Sincerely,

/s/ Erin P. Fitzgerald

Erin P. Fitzgerald
Assistant Regulatory Counsel
Rural Wireless Association, Inc.
P.O. Box 50551
Arlington, VA 22205-5551
(202) 551-0060

Attachment

cc (via email): Louis Peraertz

³ See U.S. Department of Homeland Security, *GETS/WPS NewsNotes*, (June 2015) (discussing current WPS capabilities and limitations on the four nationwide providers).



GETS/WPS NewsNotes

Voice over Long Term Evolution (VoLTE) Implications for WPS

Cellular carriers are transitioning their networks to the next generation of cellular network technology, referred to as Long Term Evolution (LTE) or 4th Generation (4G). The carriers have been offering data on LTE, but now are introducing Voice over LTE (VoLTE). Each carrier will phase in VoLTE over different timeframes. Since WPS capabilities are currently on 2G/3G networks, the transition to VoLTE may have an impact on WPS subscribers. The following information is provided for planning purposes as your organization considers upgrading to LTE/4G phones. The Department of Homeland Security Office of Emergency Communications will advise Points of Contact as this information evolves.

AT&T

AT&T offers LTE data and VoLTE services. Today, AT&T has implemented a provisioning restriction that does not allow WPS and VoLTE to coexist on the same user account because VoLTE does not currently support WPS. Therefore a subscriber must choose between the two services:

- For a new account:
 - ◇ Subscribers who order VoLTE will not be able to have WPS added.
 - ◇ Subscribers who order WPS on a VoLTE capable phone will have the VoLTE function disabled. However, all other LTE functions will be operational.
- For an existing WPS account, subscribers who order VoLTE will automatically have WPS discontinued.

Subscribers with non-VoLTE capable phones can continue to use existing WPS dialing procedures (*272 plus destination number) to receive priority.

In this Newsletter

This newsletter provides planning information on the cellular carrier transition to Voice over Long Term Evolution (VoLTE) technology and its impact on Wireless Priority Service (WPS). Subscribers considering an upgrade to VoLTE capable devices should be aware of the carrier-specific information provided in this NewsNotes. WPS subscribers with non-VoLTE capable phones can continue to use existing WPS dialing procedures (*272 plus destination number) to receive priority.

Verizon Wireless

Verizon currently provides VoLTE through dual-mode CDMA (3G)/LTE (4G) phones. WPS subscribers with these phones should continue to use existing WPS dialing procedures (*272 plus destination number) to receive priority.

T-Mobile

Currently T-Mobile offers LTE data and VoLTE services. WPS subscribers can continue to place WPS calls on T-Mobile VoLTE-enabled handsets. If originated in a T-Mobile VoLTE market area, the WPS calls will be permitted to proceed, or will fall back to 2G/3G for WPS priority treatment. While the VoLTE WPS call will not have priority over the originating LTE access segment, priority will be provided for the call across other priority-enabled components of T-Mobile's network. If the WPS call is originated in a non-VoLTE market area, the call will be shifted to the T-Mobile 2G/3G networks and will receive priority.

Sprint

Currently Sprint offers LTE data services, but has not publicly announced plans for a VoLTE service. WPS subscribers with dual-mode CDMA/LTE phones should continue to use existing WPS dialing procedures (*272 plus destination number) to receive priority.

User Assistance/Trouble Tickets

800-818-4387
703-818-4387

DHS Priority Telecommunications Service Center

866-627-2255
703-676-2255
support@priority-info.com