

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auction 1001 and 1002	)	AU Docket No. 14-252
	)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions	)	GN Docket No. 12-268
	)	
Policies Regarding Mobile Spectrum Holdings Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auction 1001 and 1002	)	WT Docket No. 12-269
	)	

To: The Commission

**COMMENTS OF THE BLOOSTON RURAL CARRIERS**

The law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, on behalf of its rural and independent telephone and wireless service provider clients (the “Blooston Rural Carriers”) and pursuant to Section 1.429 of the Commission’s Rules, hereby submits comments in support of the November 30, 2015, Petition for Reconsideration filed by PBP Group, LLC, Bulloch Cellular, Inc. (“Bulloch”), Pineland Cellular, Inc. (“Pineland”) and Planters Rural Cellular, Inc. (“Planters”) (the “*PBP Petitioners*”).

In brief, the *PBP Petitioners* urge the Commission to clarify that an applicant entity seeking eligibility for the Rural Service Provider Bidding Credit does not itself need to be in the business of providing commercial communications services, so long as its owners are providers of commercial communications services, and so long as the applicant otherwise meets the eligibility criteria for the credit.

The Blooston Rural Carriers believe that the Commission's Rules are currently broad enough and were always intended to allow rural service providers to participate in an auction through a subsidiary or related entity. In this regard, many rural service providers are regulated businesses, such as local exchange carriers, and they may wish (or need) to organize their auction participation and other non-regulated endeavors through a separate subsidiary company. If a rural telephone company does not happen to have an appropriate subsidiary company available, or if an existing subsidiary/affiliate is not currently providing service to subscribers, then it will need to participate through a new related entity in order to bid with the Rural Service Provider credit. This outcome would also be logical because the Commission's Designated Entity rules and Auction 1000 procedures go to great lengths to facilitate rural service providers coming together to bid, and many rural service providers will need to do this in order to raise the capital needed to bid for the larger PEA service areas. Such joint efforts will often require creation of a new entity.

With these considerations in mind, the Blooston Rural Carriers agree with the *PBP Petitioners* that it would be a good idea for the Commission to more explicitly clarify that the Rural Service Provider Bidding Credit will be available if the owners of the bidding entity are rural service providers and (1) the applicant together with its controlling interests, affiliates, and the affiliates of its controlling interests has fewer than 250,000 combined wireless, wireline, broadband and cable subscribers; and (2) these entities serve predominantly rural areas, defined as counties with a population density of 100 or fewer persons per square mile. Eligibility for the credit can easily be verified through submission of rural service description information, customer counts, and certifications provided in the short- and long-form applications.

Respectfully submitted,

**THE BLOOSTON RURAL CARRIERS**



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