



January 7, 2016

Via ECFS

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

RE: NOTICE OF EX PARTE:
WT Docket No. 10-208, *Universal Service Reform – Mobility Fund*
WC Docket No. 10-90, *Connect America Fund*

Dear Ms. Dortch,

On January 5, 2016, Erin Fitzgerald and Anthony Veach of the Rural Wireless Association, Inc. (“RWA”) met with Amy Bender and Erin McGrath, legal advisors to Federal Communications Commission (“FCC” or “Commission”) Commissioner Michael O’Rielly, to discuss issues related to the above-referenced dockets.

To begin, RWA discussed aspects of the proposed framework for the competitive bidding mechanism that will be used to distribute universal service support in areas where incumbent price cap carriers have turned down the offer of Connect America Fund Phase II (“CAF II”) support. RWA supports efforts to give mobile wireless providers an opportunity to participate in the CAF II reverse auction. RWA members are interested in participating in the auction, so long as the service obligations – download and upload speeds, monthly usage allowance, monthly subscription price – are set at achievable levels. RWA noted that the use of wireless technology can be a cost-effective way to provide broadband service in very rural and remote areas. RWA also discussed the mechanics of the CAF auction process, including the use of either a single-bid auction or multi-round auction in an ascending or descending format.

RWA emphasized that the CAF II reverse auction must not be viewed as a replacement for a dedicated mechanism to support mobile wireless services in rural and remote areas across the entire nation. Specifically, CAF II is not an appropriate substitute for a robust Mobility Fund intended to support the deployment and ongoing provision of mobile voice and broadband services where Americans live, work, and travel. RWA views mobile and fixed services as being complimentary to each other – mobile services offer benefits that are distinct from those offered by fixed services. In order to achieve universal service with respect to mobile services, a separate dedicated funding mechanism is necessary.

Finally, RWA discussed the interrelation of the CAF reverse auction, the Mobility Fund, and a remote areas fund, and how each program may fit into the overall universal service puzzle. This discussion touched on whether and how to maximize broadband coverage; whether and how

to prioritize unserved areas; the appropriate metric to use when deciding where Mobility Fund support should be distributed – population or road miles; the economic benefits of ensuring that mobile broadband is available for connected devices;¹ and the public safety benefits of mobile service. RWA agrees that it is important to bring broadband service to unserved areas. But, such effort to “maximize” coverage must not result in the neglect of existing mobile wireless networks that require ongoing support to sustain the provision of critical service to rural and remote areas.

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

Respectfully submitted,

/s/ Anthony K. Veach

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¹ See Letter From Anthony Veach, RWA Counsel, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 and WT Docket No. 10-208, p.2 (Dec. 22, 2015).