

The Association also urges the FCC specifically to recognize and support the availability of wireless systems serving the business and governmental industry segment to ensure that the needs of the entire rural community are addressed.

I. INTRODUCTION

1. AMTA is a nationwide, non-profit trade association dedicated to the interests of the specialized wireless communications industry. The Association's members include trunked and conventional 800 MHz and 900 MHz Specialized Mobile Radio ("SMR") operators, and commercial licensees in the 220 MHz and 450-512 MHz bands. These entities serve rural as well as urban markets and share the FCC's interest in seeing facilities deployment in less populated areas. Moreover, because they are familiar with the challenges of serving rural communities, they are specifically interested in possible financial incentives for operators investing in such markets. Thus, the Association and its members have a direct interest in the outcome of this proceeding.

II. REGULATORY AND FINANCIAL ISSUES AFFECT THE EXTENT OF RURAL DEPLOYMENT IN A VARIETY OF SERVICES

2. The Notice is correct in its conclusion that "On a national scale, the deployment of wireless mobile services has been a huge success, resulting in increased competition and services overall."³ However, it also notes that "In our highly mobile and increasingly untethered world, consumers value wireless services that offer ubiquitous and seamless coverage in a reliable manner."⁴ This Commission desire to facilitate the expansion of the geographic scope of consumer-based wireless services is at the heart of the instant proceeding.

³ Notice at ¶ 3.

⁴ *Id.* at ¶ 2.

3. AMTA supports the FCC's rural initiative. It has worked with the Commission in recent years to fine-tune an auction process that in its early stages skewed the results in favor of urban-oriented systems operated by the largest telecommunications providers, a result dictated by the geographic size and the amount of spectrum in each auction block. More recently, the FCC has tailored its auction offerings depending on a variety of factors, including the particular band, the level of incumbency and other such criteria to better correlate the spectrum offering with the marketplace. Importantly, it has recognized the critical role played by the geographic area it selects for a particular auction in determining whether coverage will be predominantly urban. Auctions 40 and 48 are good examples of the Commission's more particularized approach and were successful in making additional channels available to a wide variety of operators in both urban and rural markets. Successful bidders already are in the process of deploying facilities on the channels acquired in Auction 40 outside the major urban areas, consistent with the FCC's objective in the instant proceeding. For the most part, these systems will be used to provide a combination of dispatch and interconnected service to business and governmental users with communications requirements within the geographic area covered by a single auction license.

4. Thus, while AMTA endorses the FCC's ambitious goal of providing consumers with ubiquitous, seamless national coverage, it also encourages the Commission not to overlook the more geographically-limited needs of the business and governmental rural user community. These entities often need access to systems that can provide specialized coverage and capabilities that may not be available from consumer-oriented wireless networks. They require coverage in rural areas because that is where they conduct their activities, not for purposes of roaming from urban markets. Yet the cost of providing those types of services in less densely populated areas

can be daunting, perhaps even more daunting than it is for a large network operator to extend coverage into a rural community since the latter's costs can be distributed over the entire network. To the extent the FCC adopts regulatory changes or promotes financial initiatives that are expected to facilitate rural infrastructure deployment, AMTA urges the Commission to make such opportunities available to the full gamut of wireless service providers, not just those serving the consumer market.

5. The Association is particularly eager to work with the FCC in exploring financial incentives for rural deployment. Because the systems operated by most of AMTA's members would not qualify them for Eligible Telecommunications Carrier ("ETC") status,⁵ and thereby access to the Universal Service Fund, or, seemingly, to programs such as the U.S. Department of Agriculture's Rural Utilities Service ("RUS"), the need for alternative private and public funding is particularly critical. Those programs are designed to promote deployment of consumer-oriented services in areas that otherwise might be unserved or under-served. To the extent that they also help subsidize networks that compete with those operated by the Association's members, the playing field should be leveled by creating equivalent funding sources for systems designed primarily to meet the needs of business and governmental users. AMTA intends to continue investigating such funding opportunities and will keep the FCC advised of any regulatory changes that might be necessary or useful in that effort.

III. CONCLUSION

6. AMTA applauds the Commission's desire to promote the deployment of wireless services in rural areas, but urges it to address the needs of business, governmental and consumer users in pursuing that objective.

⁵ 47 U.S.C. § 214(e)(1).

Respectfully submitted,

AMERICAN MOBILE TELECOMMUNICATIONS, INC.

By: _____ /s/
Elizabeth R. Sachs, Esq.
Its Counsel

Lukas, Nace, Gutierrez & Sachs, Chartered
1111 19th Street, N.W., Suite 1200
Washington, DC 20036
(202) 857-3500

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