

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

In the Matter of)
)
WTB Seeks Comment on) WT Docket No. 07-71
CMRS Market Competition) DA 07-1652

**COMMENTS
OF THE
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION**

The National Telecommunications Cooperative Association (“NTCA”) submits these comments in response to the above referenced *Public Notice*¹ in which the Wireless Telecommunications Bureau (“WTB” or “Bureau”) solicits data and information in order to evaluate the state of competition among providers of CMRS for its Twelfth Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services. NTCA is a national association representing more than 570 rural telecommunications providers. While NTCA’s members are all rural incumbent local exchange carriers, most provide their rural communities with a broad array of telecommunications services, including wireless service.

NTCA regularly solicits data from its members about wireless services offered, technology(ies) employed, and customers served. NTCA’s latest wireless survey was completed in January 2007.² One hundred and six member companies responded to NTCA’s request for information. The survey results provide aggregated information

¹ *Public Notice* WTB Seeks Comment on CMRS Market Competition, WT Docket No. 07-71, DA 07-1652 (released April 6, 2007) (*Public Notice*).

² *NTCA 2006 Wireless Survey Report* (released January 2007). Attached as an Appendix to these comments.

about pricing, features, and technology. A copy of NTCA's most recent wireless survey report is attached.

I. MOBILE DATA AND BROADBAND DEPLOYMENT

In the *Public Notice*, the Bureau asks for comment about mobile data and broadband deployment. NTCA's 2006 Wireless Survey results showed 70% of those respondents offering wireless service were offering broadband data to their customers, and 27% standard data.³

Despite this level of success, however, it is likely that many more of NTCA's member companies would like to be able to offer mobile data and broadband services to their customers. Without access to rural spectrum, however, rural carriers will be unable to do so. Just under half—46%—of survey respondents indicated that spectrum access was a serious concern.⁴ The Commission can take a giant step toward solving this problem by offering spectrum at auction according to relatively small geographic areas. This will provide small carriers a fair opportunity to obtain access to the spectrum that will allow them to offer state-of-the-art wireless service to their customers

II. SERVICE DEPLOYMENT IN RURAL AREAS

NTCA's 2006 Wireless Survey shows that NTCA member companies are doing an admirable job of making wireless service available in rural areas. Sixty-eight percent of survey respondents are offering wireless service to their customers.⁵ This is particularly

³ Typically, broadband data service allows for Internet browsing, while standard data service includes text messaging, email, etc.

⁴ *NTCA 2006 Wireless Survey Report*, at 9.

⁵ *Id.*, at 6.

impressive given the difficulties inherent to providing wireless service to rural areas, such as challenging topography and low customer density. Other impediments cited by survey respondents include competition from national carriers, the ability to make necessary investments, and the ability to obtain spectrum at auction.⁶

Numerous NTCA member companies are poised to take the leap into wireless. More than half of those survey respondents not currently offering wireless service indicated they are considering doing so.⁷ Nearly two-thirds of those respondents currently offering wireless are looking to expand their wireless service area.⁸

The average survey respondent indicated their company competes with between three and five other carriers.⁹ Many of these carriers, however, serve only part of the NTCA member company service area--typically, the most populated (and hence most profitable) part.

III. CONCLUSION

NTCA's annual wireless survey shows its member companies doing a commendable job of providing service to their customers despite the often formidable challenges they face. The Commission—through such actions as making wireless

⁶ Id., at 9.

⁷ Id., at 7.

⁸ Id., at 8.

⁹ Id., at 9.

spectrum available according to smaller geographic areas—can play an important role in ensuring that rural Americans are able to receive the same high-quality wireless service as their non-rural counterparts.

Respectfully submitted,

NATIONAL TELECOMMUNICATIONS
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May 7, 2007

CERTIFICATE OF SERVICE

I, Adrienne Rolls, certify that a copy of the foregoing Initial Comments of the National Telecommunications Cooperative Association in WT Docket No. 07-71, DA 07-1652, was served on this 7th day of May 2007 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons:

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