

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

In the Matter of)
)
Wireless Telecommunications Bureau) WT Docket No. 08-27
Seeks Comment on Commercial Mobile) DA 08-453
Radio Services Market Competition)
)

**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 Thirteenth Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services. NTCA is a national association representing more than 580 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 2008.² Ninety-nine member companies responded to NTCA’s

¹ “Wireless Telecommunications Bureau Seeks Comment on Commercial Mobile Radio Services Market Competition,” WT Docket No. 08-27, DA 08-453 (released February 25, 2008) (*Public Notice*).

² *NTCA 2007 Wireless Survey Report* (released January 2008). Attached as an Appendix to these comments.

request for information. The survey results provide aggregated information 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 2007 Wireless Survey results showed 68% of those respondents offering wireless service were offering broadband data to their customers, and 30% text messaging.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—45%—of survey respondents indicated that spectrum access was a serious concern.⁴ This problem not only persists, but seems to be worsening, as evidenced by the results of the Commission's recently-concluded 700 MHz spectrum auction. Only 37% (23 of 62) of those NTCA members that participated were successful in winning 700 MHz spectrum. This is in stark contrast to the 2006 Advanced Wireless Service (AWS) Auction, where 50% of NTCA members that participated were successful. The Commission can take a giant step toward solving this problem by implementing rules and policies that will enable small carriers to effectively compete with large carriers in future spectrum auctions. This will provide small carriers a fair

³ *Id.*, at. 6.

⁴ *Id.*, at 9.

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 2007 Wireless Survey shows that NTCA member companies are doing an admirable job of making wireless service available in rural areas. Seventy-seven percent of survey respondents are offering wireless service to their customers.⁵ This is particularly impressive given the difficulties inherent to providing wireless service to rural areas, such as challenging topography and low customer density. In addition to the difficulty in obtaining spectrum at auction, other impediments cited by survey respondents include competition from national carriers, the ability to make necessary investments, and negotiating roaming agreements.⁶

Numerous NTCA member companies are poised to take the leap into wireless. Almost half of those survey respondents not currently offering wireless service indicated they are considering doing so.⁷

The average survey respondent indicated their company competes with between two and five other carriers.⁸ Many of these carriers, however, serve only a small part of the NTCA member company service area--typically, the most populated (and hence most profitable) part.

⁵ *Id.*, at 6.

⁶ *Id.*, at 9.

⁷ *Id.*, at 7.

⁸ *Id.*, at 9.

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 implementing rules and policies allowing small carriers to more effectively compete with large carriers in future spectrum auctions—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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CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing initial Comments of the National Telecommunications Cooperative Association in WT Docket No. 08-27, DA 08-453, was served on this 26^h day of March 2008 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons:

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