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Achieving Nationwide, Interoperable Public Safety Broadband Wireless Services Through a Public/Private Partnership

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Snapshot of US Cellular

- Today: US Cellular
 - Serves 6.2 million subscribers in regional clusters
 - Serves large rural areas as well as some major metro areas
 - Provides award-winning service quality
 - Has extensive broadband deployment

- Future: US Cellular intends to be
 - A strong wireless competitor
 - Offering leading broadband services
 - Across a regional footprint

- FCC Actions needed for US Cellular to continue expanding its broadband services coverage
 - Additional spectrum
 - Other key enablers — USF support including broadband, data roaming for 3G and 4G, access to advanced handsets, reduced special access charges



Committed to Providing Coverage and Quality for Public/Private Partnership in Broadband Wireless Services

- With USF support for voice services, US Cellular deployed cell towers to areas that lacked quality wireless voice service. Examples of new towers for unserved areas in 2009:
 - Iowa (Leando, Whittmore, Union, Green Bay, Akron, Ocheyedon)
 - Missouri (Rover, Sunnyview, Wyaconda, Chestnut Ridge, Dove Mountain, Cassville)
 - Nebraska (Grant, Pierce West, Snyder, Spalding, Chambers, Pleasanton, Franklin, Eustis, Leigh, Burr Crab Orchard)
 - Oregon (Bonanza, Malin, Hillcrest, Spray, Kings Spring)
- US Cellular has 3G coverage enabled on about 60% of its cell sites, reaching about 75% of its post-pay customers.
 - Broadband coverage to many previously unserved and underserved areas.
- Eight consecutive J.D. Power awards for highest call quality in North Central Region
- Seeking solutions for broadband in remote areas.
 - Applied for ARRA grants for additional broadband deployments in California, Kansas, Missouri and Nebraska.

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Enablers

1. Shared commercial use of the 700 MHz PSBL and D Blocks through public/private partnerships
2. 58 regional licenses
3. Nationwide technical standards and interoperability
4. Limited waivers for qualified test-bed builds within framework for nationwide services
5. Auction with second stage and zero, best efforts bids by PSBL to promote nationwide coverage

Shared Commercial Use of the 700 MHz PSBL and D Blocks through Public/Private Partnerships

- Two policy goals compel prompt action
 - Provide public safety entities with nationwide, interoperable broadband wireless services
 - Expand competitive broadband wireless services for consumers nationwide
- Proposals made by US Cellular and others have many solid features
 - Public/private partnership
 - Shared capacity addresses needs of public safety and commercial users – helping fund deployments and ensuring more efficient use of scarce spectrum
 - With clear technical requirements and regional licenses, D Block licenses will attract bidders. If there are areas without commercial bidders, licenses can be granted on a zero-bid, best efforts basis to the PSBL
 - Nationwide interoperability, coordination by PSBL and national committee of area licensees
 - LTE
 - Coverage and hardening above commercial levels, but still viable
 - Discounted but commercially reasonable rates for public safety users

FCC Should Develop an Approach Within the Current Statutory Framework

- FCC should not wait for legislation; instead take a “parallel path” approach
 - Depending on details, USCC not opposed to legislative solutions, but passage is uncertain and delays are likely
 - Path forward is available within existing FCC authority that will put spectrum in service sooner, permit early builds, and facilitate nationwide public safety broadband network
 - If legislation changes framework, FCC can readily adjust rules. If that doesn’t happen, FCC will be ready to move forward with an auction rather than losing months or years waiting.
 - **Re-auction of D Block can be successful**
- Commercial uses of PSBL and D Block spectrum, within the public/private partnership framework, would serve the public interest and must be preserved
 - **Shared use will fund the network and support nationwide public safety services**
 - Spectrum – the lifeblood of wireless broadband competition – has become highly concentrated; more commercial capacity is needed to support competition

58 Regional Licenses

- Public safety regions for 700 MHz planning facilitate:
 - Customization to meet local public safety needs with national standards
 - Coverage for urban and rural areas
 - Nationwide coordination for interoperability
- Interest at state level demonstrated by several pending waiver requests
- Attractive size for potential bidders
- Eliminate complexity of mega-regional packages
- Reduce minimum opening bids in areas with high costs for narrowband relocation

Technical Standards and Interoperability

➤ Technical Standards

- Public safety organizations and commercial carriers chose LTE
- US Cellular and others made solid proposals on coverage, build out, capacity, reliability and other standards

➤ Interoperability

- National committee to coordinate D Block licensees with PSBL and FCC
- National platform for certain public safety applications
- Reasonable efforts to support gateways for other public safety networks and satellite coverage

Limited Waivers for Qualified Test-Bed Builds Within Framework for Nationwide Services

- Select limited number of early builders in PSBL spectrum within framework for nationwide, interoperable coverage
 - **Waivers should not undermine policy of widespread coverage**
 - Technical compatibility using LTE
 - Demonstration networks with technical and financial qualifications
- After licensing D Block, early builders could:
 - Continue operations in PSBL spectrum, with commercial services using D Block and spare PSBL capacity; or
 - Combine with applicable D Block licensees for shared network and spectrum, compensated at negotiated value based on depreciated cost and avoided cost for shared network
- Nationwide coordination through PSBL



Auction with Second Stage and Zero, Best Efforts Bids by PSBL to Promote Nationwide Coverage

- Address any unsold D Block licenses from auction's first stage through a second stage with relaxed rules for commercial bidders
 - Lower minimum opening bids
 - Possible adjustments to coverage and technical requirements
- PSBL becomes zero, best efforts bidder and licensee for unsold D Block licenses at end of second stage
 - Flexibility for PSBL on coverage and technical requirements in deploying services to meet public safety needs in region
 - Could apply an RFP process to partner with commercial operators for shared network and uses
 - Could work with public safety entities in region