



**FEDERAL COMMUNICATIONS COMMISSION  
WIRELESS TELECOMMUNICATIONS BUREAU  
MEMORANDUM**

**TO:** FCC Secretary

**CC:** Jane Jackson  
Margaret Wiener  
Martha Stancill  
Amy Bender

**FROM:** Scott Mackoul

**SUBJECT:** Notice of *Ex Parte* with Bluegrass Cellular – **GN Docket No. 09-51** and  
**WC Docket No. 10-90**

**DATE:** October 6, 2010

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This memorandum provides notice of an oral ex parte initiated by FCC staff to discuss issues relating to the National Broadband Plan's recommendation that the Commission create a Mobility Fund to provide one-time support for deployment of 3G networks. This notice is to be included in GN Docket No. 09-51 (National Broadband Plan) and WC Docket No. 10-9 (Connect America Fund).

On September 13, 2010, Ron Smith and Chuck Willis of Bluegrass Cellular ("Bluegrass"), met with Jane Jackson, Margaret Wiener, Martha Stancill, and Scott Mackoul of the Commission's Wireless Telecommunications Bureau and Amy Bender of the Commission's Wireline Competition Bureau via teleconference.

Bluegrass noted that it provides 3G coverage to 80 percent of the population in its service area, and expects to reach 90 percent 3G coverage by next year. Bluegrass suggested that the Mobility Fund could be useful to bring 3G coverage to the remaining 10-20 percent, and that special consideration should be given to carriers that already provide a sufficient amount of 3G coverage. Bluegrass noted that, even though it has excellent 3G coverage, it will not necessarily be easy to go to 4G because of mainly two issues: equipment availability and nationwide data roaming. Specifically, according to Bluegrass, the 4G equipment available so far only works on specific bands, and the largest carriers are refusing to allow nationwide data roaming. Bluegrass stated that, without interoperable 4G equipment and the data roaming, many small rural carriers will not see a business case to build-out 4G networks.