

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109

**REPLY COMMENTS OF MTPCS, LLC D/B/A CELLULAR ONE**

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May 23, 2011

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**REPLY COMMENTS OF MTPCS, LLC D/B/A CELLULAR ONE**

MTPCS, LLC d/b/a Cellular One and its affiliates (collectively, “MTPCS”) hereby submit comments in response to the Notice of Proposed Rule Making (“*Notice*”) in the above-captioned docket.<sup>1</sup> MTPCS is a facilities-based rural wireless carrier providing switched wireless GSM and CDMA voice and data communications services over its networks of hundreds of cell sites in rural Montana, Wyoming, Texas, Oklahoma, Louisiana, and the Gulf of Mexico.

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<sup>1</sup> / *Notice of Proposed Rule Making, In the Matter of Universal Service Reform Mobility Fund, WT Docket No. 10-208, FCC 10-182 (October 14, 2010) (“NPRM” or “Notice”).*

I. Executive Summary.

Continuing support for wireless carriers is critical to ensuring public safety and economic development in rural areas. The Commission should use wireline and wireless cost models to determine support rather than reverse auctions, which favor larger carriers, as noted by the Rural Cellular Association, RCA Comments at 3. We urge the Commission to consider that portability works today among CETCs to avoid duplication of support, and remains a good solution for achieving efficiencies in the Fund. As noted by many public officials whose letters of concern are cited in this Reply, universal service support must be sustained for rural wireless, in order to make available for citizens the public safety, economic development, and coverage best suited for rural areas. MTPCS urges the Commission to retain wireless services in rural high cost areas by adopting an exemption for rural or small business providers and accommodating the needs of residents of tribal lands. In the event the Commission proceeds with auctions, MTPCS urges that only currently eligible ETCs and CETCs should be eligible for such auctions, as they have submitted to intensive, fact-driven inquiry by interested states in order to receive designation.

Public service commissions in rural states such as Alaska, Indiana, Nebraska, Kansas, Mississippi and Utah have filed comments in these dockets expressing a range of serious concerns. For example, the Utah Commission said the proposals in the *Notice of Proposed Rule Making* will injure the FCC's previous goal of ensuring rural consumers' access to services at rates that are affordable and reasonably comparable to those in urban areas. Similarly, the Indiana Utility Regulatory Commission commented that it is concerned the FCC's proposals "at best threaten the realization of urban/rural parity required by Section 254(b)(3), and at worst result in

an outright violation of this legal mandate.” Comments of the Indiana Utility Regulatory Commission, at 2 (April 18, 2011).

II. Allocating Funds For Broadband, While A Laudable Goal, Should Not Be Accomplished By Ceasing Support For Basic Communications Services.

MTPCS believes the Commission can and should fairly and equitably address calls for reform while ensuring that important services will remain available in rural areas, at reasonable rates, and reasonably comparable to those available in urban areas. The broadband goal should supplement basic service, and basic service can be enhanced to provide broadband, but basic service must not be decreased in order to provide broadband to a far smaller subset of areas. The Commission’s broadband goal cannot eliminate the principles set forth in Section 254 of the Act. Congress directed the FCC to draft a plan, not to implement it. Congress has not amended the existing provisions and consumer protections of the statute. Accordingly, we have confidence the Commission will proceed with respect for the legitimate interests of consumers and public safety interests in rural areas.

Many people receive their only telecommunications services from wireless providers.<sup>2</sup> If citizens lose wireless service due to reform, and mobile broadband is no longer supported in their area, they will have fewer services than are available in urban areas, possibly losing their primary telecommunications service, rather than having access to reasonably comparable services as described in Section 254.<sup>3</sup> We urge the Commission to act fairly and equitably in order to avoid such a result.

III. Single-Winner Auctions And Uneven Glide Paths To A New System Would Achieve Neither The Existing Statutory Principles Nor The Commission-Authorized Principle Of Competitive Neutrality. Continuing Support In Certain Cases, With A Baseline Of Cost Models, Would Better Serve Rural Areas.

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<sup>2</sup> / See data referenced *infra* note 7.

<sup>3</sup> / 47 U.S.C. § 254.

A. Glide Paths Must Be Rational and Technologically Neutral.

Commenters such as the Rural Cellular Association, the Rural Telecommunications Group, and U.S. Cellular have all reminded the Commission of the importance of technical neutrality – in phasedown periods, in glide paths, in any rights of first refusal, and in any “make-wholes,” among other mechanisms. Public safety is critical in vast areas. Accordingly, it is critical to not have a lapse in wireless coverage and, therefore, support, before or during the time any new system is implemented: any decrease in support for wireless must follow, not precede, the availability of a new support mechanism for wireless. As stated by Colonel Michael Tooley, Chief of the Montana Highway Patrol:

We have a lot of Montanans who live in these remote areas or visit for hunting, fishing, and other recreational activities. Wireless communication is their only form of contacting public safety offices, including the Montana Highway Patrol, and other services reachable through 911, in case of an emergency.

***The use of the Universal Services Fund to support wireless communication in these areas is essential. Loss of such funding for any wireless networks could result in a reduction of communication services in these areas, therefore negatively impacting the Patrol's ability to respond to emergencies.***

Letter from Col. Michael T. Tooley, Chief, Montana Highway Patrol, to Chairman Genachowski (May 16, 2011) (emphasis supplied).

B. A Monopoly or Duopoly Would Contravene Congressional Intent, State Statutes.

Anointing a single monopoly recipient of support, or even a duopoly (still capable of manipulating a marketplace) would place federal regulations in opposition to state laws; for example, Montana Code Annotated Section 69-3-802 (“To the extent that it is consistent with maintaining universal service, it is further the policy of this state to encourage competition in the telecommunications industry, thereby allowing access by the public to resulting rapid advances

in telecommunications technology. *It is the purpose of this part to provide a regulatory framework that will allow an orderly transition from a regulated telecommunications industry to a competitive market environment....*”). M.C.A. § 69-3-802 (emphasis supplied). Such state statutes are consistent with the intent of Congress in passing the Telecommunications Act of 1996 (“An Act To promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.”); *see* Preamble, 110 Stat. 56; *see also* H. R. Conf. Rep. No. 104-458, p. 1 (1996). Moreover, the Act sets forth the principle of achieving access to rural services reasonably comparable to urban services; a single service provider would fail to achieve this principle of Section 254.

Reverse auctions are not a workable solution to benefit consumers. Large entities’ revenues from large urban areas are extraordinary; deep pockets provide a predictable auction result. This would not benefit rural citizens. Policing a monopoly carrier to produce the low rates and variety in services currently produced by a marketplace would require an expensive supplemental army of government enforcers, a large array of new regulations which would be in court for many years, and massive regulatory burdens on those carriers and on the Commission staff who must interpret and enforce those rules. This morass, a return to the Bell System, would be unnecessary and should be avoided.

C. Any Auction Should Not Be Open to Companies Not Currently ETCs or CETCs in An Area.

In the event the Commission does hold an auction, only companies that have in the past submitted to extensive eligibility proceedings have shown the true interest in serving the public in high cost areas that should be the issue in considering eligibility. Fact-driven existing pro-

ceedings can take well in excess of a year, but are important to ensure that only carriers capable and planning to serve in the public interest in a state will be deemed eligible for support.

D. Any Separate Auction for Mobility Funding Should Provide Adequate Support for Continuing Operation and Maintenance of Rural Networks.

The Commission should base its decision-making upon informed knowledge of the wireless industry and its own regulations, such as expenditures required to keep wireless networks going, including core expenditures, vendor-mandated or advised maintenance and upgrade programs, cell site rent, utilities, and the like. A single one-time upgrade infusion is not sufficient to keep mobile broadband networks running.

E. The Benefits of Portability and Competitive Choices.

1. CETCs Are Motivated By A Portability-Driven Marketplace To Invest Support In Their Networks.

Support to multiple CETCs in an area is not duplicative. Competitive carriers share support in an area – they divide it up and the total amount does not increase (and under the current cap, the support remains the same despite increasing customer numbers).

2. Any Minimal Inefficiency Is Less Important Than The Public Interest In Access To Lower Rates And More Service Plan Options.

Some commenters may believe this is inefficient, but the public interest in receiving services in accordance with the principles of the Act is more important than some minimal inefficiency. A de minimis amount of inefficiency permitting consumers to have access to more reasonable rates and higher quality services or coverage is far preferable to a government-granted monopoly franchise. A system with sufficient support, shared via portability to keep duplication to a minimum, is far better for consumers than a federally appointed monopoly or duopoly. As Justice Breyer once wrote, “[The Telecommunications Act of 1996] finds the competitive

process an indirect but more effective way to bring about the common objectives of competition and regulation alike, namely low prices, better products, and more efficient production methods.”<sup>4</sup> And as the Chairman has noted, “***Healthy competition produces greater innovation and investment, lower prices, and better service.***” Chairman Genachowski, Keynote, CTIA Wireless 2011, March 22, 2011.

IV. CETC Support is Decreasing. There Is No Longer Any “Emergency” In The Fund.

Windstream asserts that CETC support is one third of all high cost support and is duplicative. Windstream Comments, at 5. Receiving one third of the support would be logical because more than one third of customers now use wireless services all or most of the time.<sup>5</sup> Moreover, when Verizon and Sprint phase down, the fund will be reduced by \$300 million of CETC high cost support; in the event AT&T and T-Mobile phase down, another \$300 million will be reduced, and the remaining CETC high cost support will still comprise an even smaller percentage of the \$4 billion fund. High cost support is declining and customer contribution rates are falling. Accordingly, the reasons justifying imposition of the “interim” “emergency” cap on CETC sup-

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<sup>4</sup> / Separate opinion of Breyer J., concurring in part and dissenting in part, Verizon Communications Inc. v. FCC (00-511) 535 U.S. 467 (2002), 219 F.3d 744, aff’d in part, reversed in part, and remanded.

<sup>5</sup> / See, e.g., the National Center for Health Statistics, S. J. Blumberg, Ph.D., and J. V. Luke, Div. of Health Interview Statistics, *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January - June 2010*, available at <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201012.htm> (During the first half of 2010, approximately one in four American homes (26.6%) had only wireless phones, and one in six (15.9%) had a landline yet received all or almost all calls on wireless phones; this totals more than 42% of Americans who primarily use wireless phones); see also, e.g., Dan Frommer, “Chart of the Day: Almost a Third of U.S. Families Have Cut the Landline Cord,” <http://www.businessinsider.com/chart-of-the-day-almost-a-third-of-us-households-have-cut-the-landline-cord-2010-8> (regarding Citi Investment Research Report on disconnection of landline phones – “That’s bad news for the big U.S. telcos like AT&T and Verizon, but it’s also positive for the big U.S. wireless companies, like... AT&T and Verizon.”).<sup>1</sup>

port have ceased to exist. There is no good reason to further diminish support to wireless services, which fulfill the public interest in safety and economic development.

1. Mobility Is Increasingly Chosen by Consumers and Should Be Supported Increasingly.

Depriving consumers of their preferred choices<sup>6</sup> would be unacceptable in light of the Act and the Commission's mandate to regulate in the public interest. Increasing support to CETCs would permit increasing deployment of mobile services, which could include broadband, benefiting consumers.<sup>7</sup> The Commission must ignore the cacophony and instead fulfill its statutory public interest mandate and the urban/rural comparability mandate of Section 254 of the Act.

Consider the future: in ten years, when two thirds of retail voice landline access lines have disappeared, and those customers have continued to flock to wireless, which technology should receive adequate support in rural areas? Wireless is not only the efficient choice from a cost perspective but also the customer choice that best protects public safety and rural business development. Wireless service is critical to public safety, and important for telemedicine, agriculture, forestry, and other key functions in high cost areas.<sup>8</sup>

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<sup>6</sup> / *See id.*

<sup>7</sup> / Some carriers complain about identical support while failing to recall that CETCs, although they do not have the same costs as ILECs, have completely different costs that ILECs do have. Some of these costs are addressed in the text, *infra*. The Commission could recognize and incorporate applicable costs into its rules. Where one set of carriers fails to recognize some of these basic economics of another's business, it clearly lacks sufficient information to tell regulators how to regulate or support the other.

<sup>8</sup> / *See, e.g.*, Letter from Rep. Billy Chandler (LA) to Chairman Genachowski ("In rural Louisiana, regional and local cellular carriers provide critical service coverage and frequently offer lower prices as well. The support these systems receive from the Universal Services Fund is vital to maintaining necessary coverage. Any reduction in funding would likely affect necessary communications resources and impact public safety in my heavily forested district."); *see also* Letter from Sen. Neil Riser (LA) to Chairman Genachowski (May 16, 2011) (emphasis supplied):

2. Existing Cell Sites Must be Maintained, As The Most Efficient Platform for Broadband.

Any verbal promises to build new cell sites in rural areas are nonbinding, and the gap until any such potential future buildout would be long and susceptible to alteration. Small and regional rural carriers provide strong coverage of less populated areas; their networks are utilized for roaming purposes and are shown on network maps by larger carriers. As noted by Montana Representative Harry Klock,<sup>9</sup>

In rural states, regional and local cellular carriers provide service that is important to consumers. Although national carriers make an effort to cover the nation, we find that regional and small networks have been critical to providing contiguous coverage of rural areas, as well as often lower prices.

These existing facilities would be the most expedient platform to roll out broadband to rural areas at merely incremental cost, rather than paying auction winners to construct entirely new towers, network and equipment in such areas while excising competitors from such areas to the detriment of rural consumers.<sup>10</sup> As proposed in a presentation MTPCS made in April,<sup>11</sup> the

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... [M]y district... encompasses one-tenth of Louisiana's land mass and covers the entireties or large portions of ten rural parishes [counties] along the Mississippi River. **Telecommunications service is critical to these citizens, most of whom work in agriculture and forestry and many of whom travel long distances to work in mills or plants. Regional and small carriers have been instrumental in providing quality coverage and service, which they may not have been able to do without critical financial support from the Universal Services Fund. Any restrictions on the use of that assistance could limit coverage and impact rural Louisianans both from a communications and a public safety standpoint.** My hope is that you find a solution that will allow the current cell phone systems to continue receiving support from the Universal Services Fund and expand that service coverage.

<sup>9</sup> / Letter from Rep. Harry Klock to Chairman Genachowski (April 27, 2011).

<sup>10</sup> / Many existing towers could not be used by some other auction winner because any such carrier would be licensed for the same band of spectrum an existing carrier currently uses and therefore would want different spacing of towers, and any new carrier in an area is likely to be deploying a different generation of equipment or a different manufacturer's network technology, and may prefer different configurations for roaming or other purposes than the tower configurations used by an existing carrier.

Commission should adopt a small business exemption in order to keep wireless coverage in rural areas, to the benefit of the public interest.<sup>12</sup>

3. CETC Costs of Maintaining And Operating Networks Are Not Negligible and Must Be Supported for the Long Term for the Benefit of High Cost Area Consumers. This Is After All The Purpose of the Universal Service Sections of the Act.

Wireless CETCs' high cost area expenditures are significant and real. Although one or two national carriers may be able to subsidize rural operations with urban revenues, their rural operations to date have been minor forays; they continue to depend upon local carriers for roaming coverage. Initial capital expenditures for cell sites, such as spectrum and the cost of constructing cell sites, are material, particularly as rural carriers are still deploying mobile service in formerly unserved areas. Continuing operating expenditures may be somewhat less than those of a landline carrier after initial wireless buildout is complete, but they are not insignificant, particularly in very high cost areas. Cell site rentals paid to landowners, high utility costs for electricity

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<sup>11</sup> / Cellular One FCC Presentation (filed April 5, 2011), at 15 ("small business" would be defined as an entity that has 1500 employees or less – based upon the SBA definition for telecommunications companies aside from satellite).

<sup>12</sup> / See, e.g., Letter from Alan Olson, Chairman, Montana Senate Energy and Telecommunications Committee, to Chairman Genachowski (April 27, 2011) (emphasis supplied):

**The financial support that the cell phone systems in Montana receive through the USF is critical to maintaining communication systems in rural Montana.** Montana is a very large and yet sparsely populated state. My senate district is 200 miles long and approximately 60 miles wide and yet contains only approximately 18,000 residents. Many of my constituents are located in very small rural communities, and many of them don't live in any community at all. They are many, many miles from the nearest post office. **Cell phone coverage in these areas is critical, not only for communication purposes but for public safety purposes.** Moreover, my private employment requires me to be located in isolated areas of Montana in which there is no land line communication system. Montana is currently undergoing an oil and gas boom and much of that activity is located in such areas. As a result, **cell phone communication is absolutely critical to the economic development of our oil and gas resources in Montana. ...**

to all the cell sites, backhaul (whether microwave or landline), support and maintenance of each site and of cell site base station transmitters, repeaters, vendor-required software upgrades, payments for support required by equipment vendors, and core costs such as allocations of switch engineering costs, E911 Phases I and II, and CALEA compliance all add up.

We believe one or more wireless cost studies will be filed to help the Commission in this analysis. Small carriers have not undertaken this effort because cost studies are extremely expensive, and wireless carriers do not receive RUS grants. Nevertheless, we believe one or more thorough studies will be filed, and we ask the Commission to review with a desire to understand and respect the wireless industry rather than follow commenters' efforts to fit it like square pegs into the round holes of another industry.

4. Wireless Networks Do Not Need Landline, But Both Technologies Can And Should Coexist.

Regarding certain commenters who continue to treat this proceeding as a "winner take all" cage match, advocating for the demise of rural competitive carriers, it is apparently necessary to note that landline facilities are not a rock upon which wireless carriers stand, and wireless support does not somehow take away support from ILECs. Where landline connections are unavailable or too expensive, wireless carriers utilize other means of backhaul, such as microwave. In fact, Viaero Wireless, MTPCS's neighbor to the east in Nebraska, Colorado and Kansas, has constructed its backhaul network almost entirely of microwave links. If landline disappeared, wireless networks would carry on.

Nevertheless, MTPCS continues to believe carriers can coexist reasonably, "sharing the pain" with portable support. Although portability would diminish landline support, it would con-

tinue to provide a fair amount of support in proportion to the number of customers served. Rural consumers need access to mobile as well as fixed communications.

F. A Small or Rural Business Exemption Should Be Adopted in Order to Retain Valuable Coverage and Pricing.

Small and regional carriers already serve rural areas well, with reasonable prices for consumers. Providing them with existing support should be enough to advance broadband in rural areas. Ensuring continuing support, which could be based upon rational and sufficient cost models but must be sufficient to cover sufficient core costs as well as site specific costs, will be the fastest route to extending broadband to rural areas. As the Small Business Administration recently concluded, “*Significant effort is necessary to open the broadband provider market to small businesses.*”<sup>13</sup>

G. Portability of Support Motivates Upgrades Which Are The Most Efficient Platform For Broadband.

The current universal service system motivates wireless CETCs to upgrade their networks and is over time permitting carriers to implement broadband. MTPCS is installing its 3G core this year, and carriers that serve some more populous areas, such as AT&T, Cellular South and U.S. Cellular, have already deployed 3G and are now working towards 4G. A portable support system, as is currently used for CETCs, provides free market incentives for improvements in order to retain or gain customers. This can continue only while the effects of the cap, or other loss of support, do not become too severe to enable upgrades in the public interest.<sup>14</sup>

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<sup>13</sup> / “The Impact of Broadband Speed and Price on Small Business,” Columbia Telecommunications Corporation for the SBA Office of Advocacy, available at <http://archive.sba.gov/advo/research/rs373tot.pdf> (November 2010).

<sup>14</sup> / Over time, as CETCs add customers, the amount of support per customer decreases. We urge the Commission to take a careful look at the considerable challenge of deployment in a mountainous state

V. Conclusion.

Instead of an auction, the Commission should use wireline and wireless cost models to determine support, and eliminate any “duplication” in the fund by ensuring support for all participants is portable. This will permit the carriers that best suit the needs of consumers and public safety to continue to provide life-saving service in high cost areas. We urge the Commission to consider that portability works today among CETCs to avoid duplication of support, and it remains a good solution that should be extended to all carriers in order to achieve significant efficiencies in the Fund. As noted by many public officials in this docket, universal service support must be sustained for rural wireless, whether through a small business exemption or a cost model approach, in order to make available for citizens the services and coverage best suited for rural areas. The FCC should consider the vital importance of continued availability of financing for companies serving rural markets, and the continued importance of mobility in rural areas, for public safety, agriculture, jobs, and economic development, among other important purposes.

Respectfully submitted,

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such as Montana, a state that requires CETCs to build out so as to serve 98% of the population in eligible areas.

## CERTIFICATE OF SERVICE

I hereby certify that, on April 18, 2011, I caused a true and correct copy of the foregoing Comments to be served by electronic mail on the following:

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