

# LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200  
MCLEAN, VIRGINIA 22102  
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS  
DAVID L. NACE  
THOMAS GUTIERREZ\*  
ELIZABETH R. SACHS\*  
DAVID A. LAFURIA  
PAMELA L. GIST  
TODD SLAMOWITZ\*  
BROOKS E. HARLOW\*  
TODD B. LANTOR\*  
STEVEN M. CHERNOFF\*  
KATHERINE PATSAS NEVITT\*

CONSULTING ENGINEERS  
ALI KUZEHKANANI  
LEILA REZANAVAZ  
—  
OF COUNSEL  
GEORGE L. LYON, JR.  
LEONARD S. KOLSKY\*  
JOHN CIMKO\*  
J. K. HAGE III\*  
JOHN J. MCAVOY\*  
HON. GERALD S. MCGOWAN\*  
TAMARA DAVIS BROWN\*  
JEFFREY A. MITCHELL  
ROBERT S. KOPPEL\*  
—  
\*NOT ADMITTED IN VA

August 6, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, DC 20554

Re: United States Cellular Corporation  
WC Docket Nos. 10-90, 07-135, 05-337, 03-109.  
CC Docket Nos. 01-92, 96-45, and GN Docket No. 09-51

Madame Secretary:

On behalf of United States Cellular Corporation (“U.S. Cellular”), we write to provide the Commission with additional information for the record as a follow up to our meeting of June 30, 2011.

In response to the Commission’s indication that it is considering the implementation of separate fixed and mobile broadband funds, U.S. Cellular has commissioned CostQuest Associates to develop a proof of concept implementation of a forward looking economic cost model for use in determining the funding for wireless High-Cost USF. U.S. Cellular has asked CostQuest to estimate the cost to serve areas (and users) not presently serviced with 4G wireless broadband technology, determine commercial viability, and identify areas in need of external funding support.

U.S. Cellular has asked CostQuest to estimate the costs for wireless mobility and broadband services in Maine, Nebraska, West Virginia and Wisconsin, four diverse states that can be seen as a proxy for other similarly situated states. This document will hopefully assist the Commission in investigating high-cost support issues and developing a model for a mobile broadband fund.

A robust mobile broadband fund is critical to our nation’s economic development. As Chairman Genachowski said this week:

The smartphone market has taken off in the last two years, with the devices and networks getting smarter and faster every day, and with sales up 45% just in the last year. Tablets – an amazing game-changer – didn't exist two years ago. In 2011, Americans will buy 26 million of these mobile marvels, and 83% of Fortune 500 companies are already testing or deploying iPads. The apps economy on smartphones and tablets continues to grow, with more than 80,000 developers creating 500,000 unique apps – providing benefits to consumers, and creating jobs.<sup>1</sup>

Without a robust mobile broadband ecosystem in our nation's rural and high-cost areas, obvious and substantial economic development benefits will be delayed or denied. U.S. Cellular and many other rural wireless carriers have been using support to construct new cell sites that provide vital coverage in rural communities, sites that are broadband-ready from day one.

It is critical that the Commission properly size a mobile broadband fund to ensure that these benefits are accelerated in rural areas. Accordingly, the enclosed work product is intended to be a starting point for the Commission to develop a means of providing support on the efficient costs of deploying network infrastructure in rural high-cost areas. We look forward to continuing work on this critical mission.

Sincerely,



David A. LaFuria  
Counsel for United States Cellular Corporation

Enclosure

cc: Sharon Gillett, Esq.  
Carol Matthey, Esq.  
Mr. Steven Rosenberg  
Bradley Gillen, Esq.  
Patrick Halley, Esq.  
Joseph Cavender, Esq.  
Margaret Wiener, Esq.  
Martha Stancill, Esq.  
Grant Spellmeyer, Esq.

---

<sup>1</sup> FCC Chairman Julius Genachowski Remarks on Plan to Create 100,000 New Broadband-Enabled Jobs  
Jeffersonville, Indiana August 4, 2011.