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February 10, 2012

Via ECFS

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

Re: Notice of Ex Parte

Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
High-Cost Universal Service Support, WC Docket No. 05-337
Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Universal Service Reform – Mobility Fund, WT Docket No. 10-208

Dear Ms. Dortch:

On Thursday, February 9, 2012, the undersigned representing the Rural Telecommunications Group, Inc. (“RTG”) spoke via telephone with Margaret Wiener, Division Chief, Auctions & Spectrum Access Division of the Wireless Telecommunications Bureau to discuss data to be used in the Mobility Fund Phase I auction (“Auction 901”).

RTG expressed concerns based on feedback from RTG members regarding the data to be used to determine Census blocks to be both included and excluded in Auction 901. RTG expressed particular concern regarding the accuracy and reliability of American Roamer data to identify wireless service coverage using 3G (i.e., coverage of networks using EV-DO, EV-DO Rev A, or UMTS/HSPA) or 4G or better technology such as HSPA+ or LTE. RTG members found areas identified as covered that are actually not covered and areas that are uncovered that are actually covered. Because American Roamer data is self-reported by the carriers that subscribe to American Roamer’s services for use in their sales and marketing material, RTG is concerned that there is a tendency to over report coverage. Also, because the majority of RTG’s members do not use American Roamer’s services and do not report coverage data to American Roamer, RTG believes that the data being used by American Roamer is inaccurate. RTG has learned that larger carriers often report estimates of coverage by smaller carriers based on roaming agreements that do not contain coverage areas. This third party reporting of inaccurate data has skewed the data the FCC is now trying to rely on as factual.

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In addition to expressing concern with the proposed use of American Roamer data, RTG expressed concerns regarding other data tools pertaining to Auction 901, including the Commission's mapping tool and spreadsheet of unserved census blocks. Because these tools contain incomplete or inaccurate data and do not correspond to reliable coverage maps, they have been of limited use and RTG members have had to purchase separate resources to compensate for these deficiencies.

RTG notified Ms. Wiener that it plans to file comments addressing these concerns in greater detail, and also that it would need additional time to gather information from its members. Accordingly, RTG also plans to file a motion requesting an extension of time to extend the comment deadline.

Should you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

By: */s/ Caressa D. Bennet*

Caressa D. Bennet

cc: Margaret Wiener
auction901@fcc.gov