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March 15, 2012

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

~~Re: [Redacted]~~

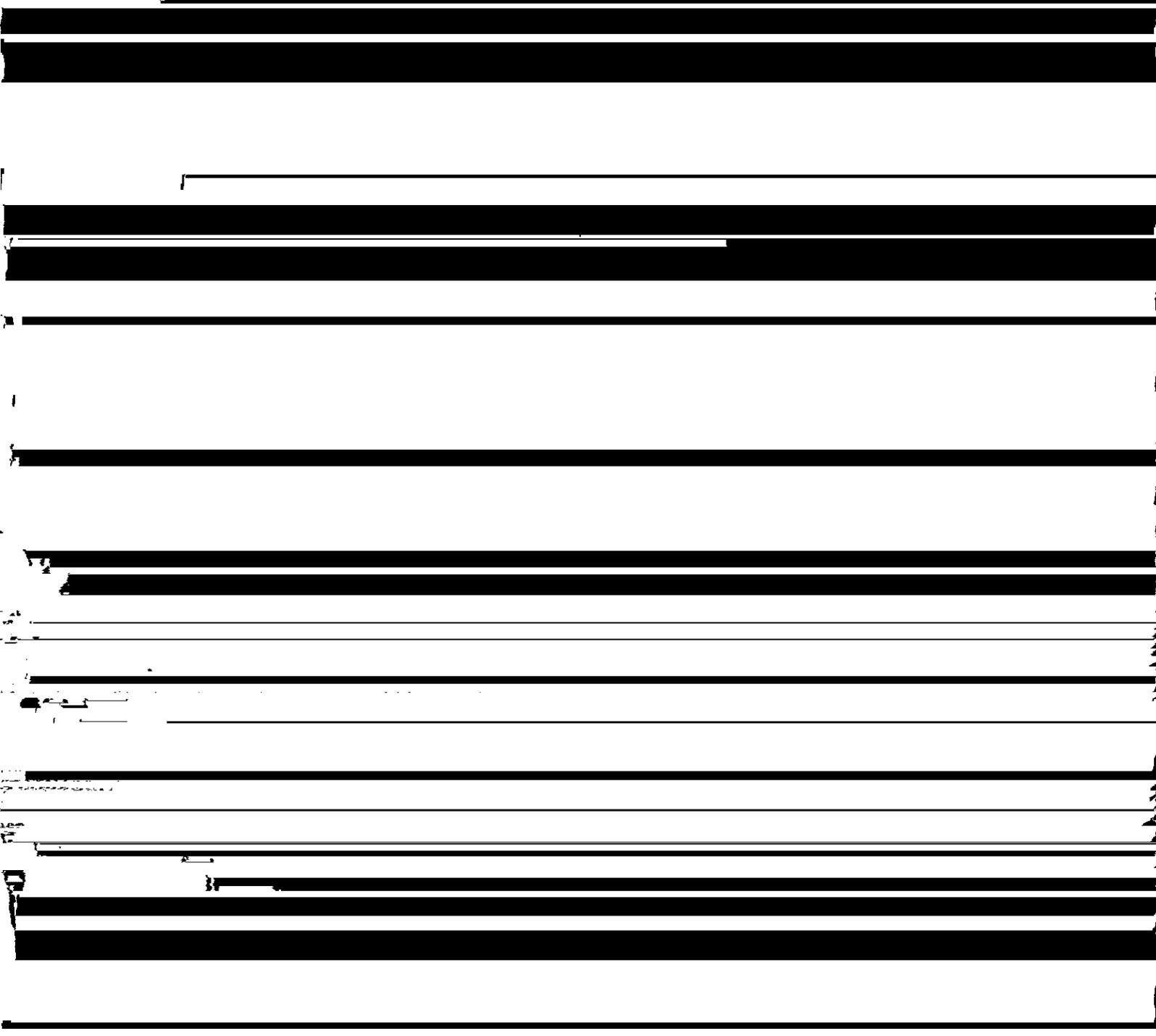
[Redacted]

CAF recipients to submit information that shows that the Map is inaccurate. WISPA stated that if the Commission accepts information from CAF Phase I recipients concerning whether a particular area is unserved in contravention to the Map, it must also allow existing service providers to comment on and rebut the recipient's submission.⁴

In the Telco Ex Parte Letter, ITTA, joined by the three local exchange companies, propose details to their proposal with respect to census blocks that are partially served by fixed broadband providers.

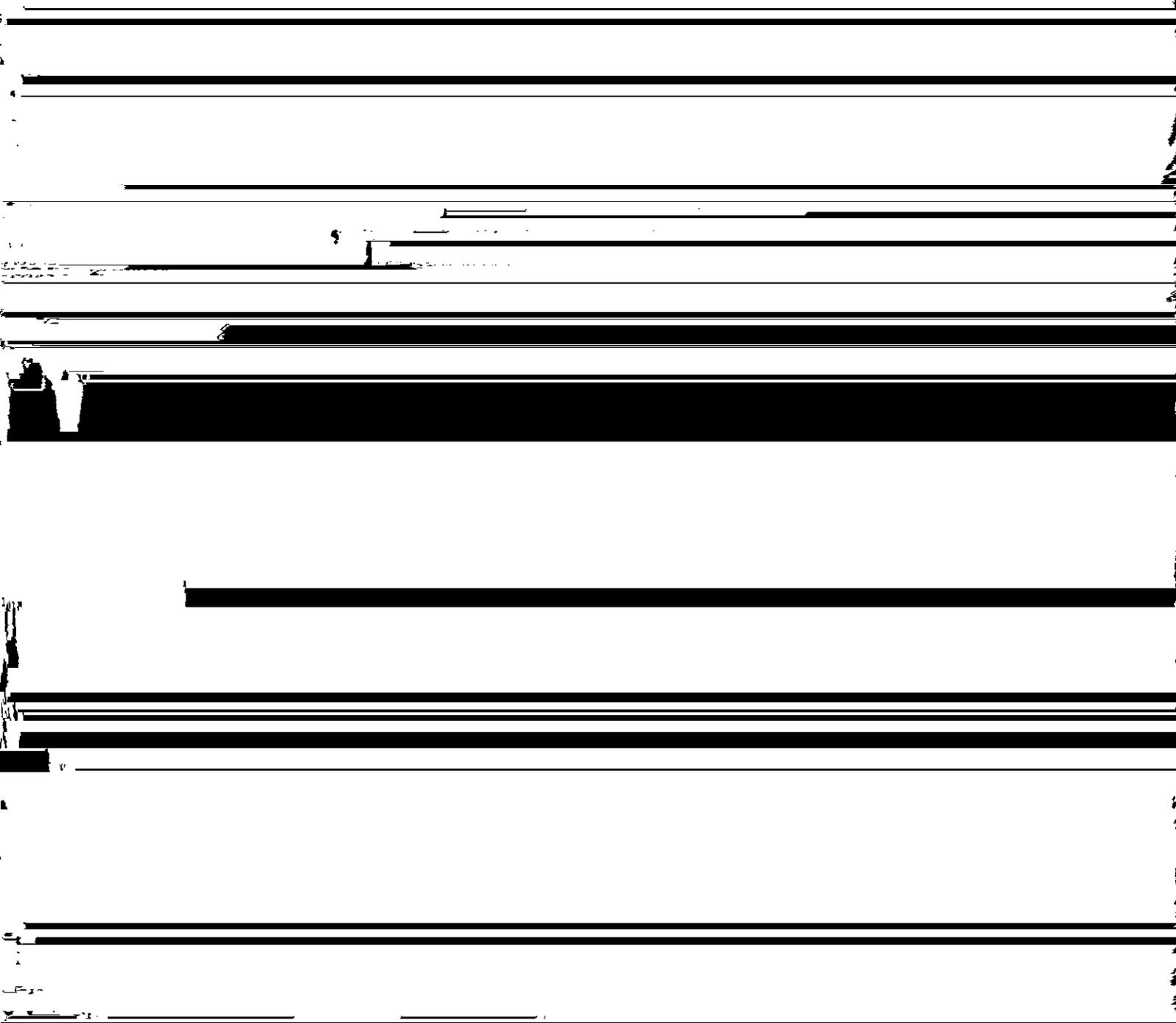
Census Blocks Clearly Identified as Partially Served on the Map

In those cases where the Map accurately indicates that a census block is partially served and therefore ineligible for CAF Phase I support, the Telcos propose that the census block would be eligible for support where the CAF recipient's officer provides written certification that it intends to use CAF support to deploy broadband only to



Other Partially Served Census Blocks

In cases where the Map shows fixed broadband coverage to a census block, the Telcos argue that CAF Phase I recipients should have the opportunity to present evidence that the Map is inaccurate because it overstates the amount of fixed broadband coverage. The Telcos propose that recipients be permitted to provide written certification that, to its best knowledge, the Map is inaccurate and there are unserved locations within the census block. If the certification is supported by “consumer declarations or other supporting evidence,” the CAF Phase I recipient’s showing could not be rebutted.⁶ If, however, no such supporting information is submitted, the existing fixed broadband provider would have 30 days to provide a certification that it is “capable of providing service at requisite speeds to all locations in the entire relevant area”⁷ with the certification supported by one



become more and more accurate. Further, the mapping contractors are impartial, with no stake in the outcome of a funding decision or subsidy rule – they take the data provided to them and make decisions on where to draw lines without regard to the CAF implications of their work. The Telcos should work with the mapping contractors to help address any inaccuracies, not burden the CAF Phase I process with post-mapping procedures that are one-sided in favor of the CAF recipient, or which invite challenge and dispute that will delay provision of funding to unserved areas.

WISPA shares the Telcos' view that CAF Phase I support funds should be provided only for unserved areas, and appreciates that the Map is not perfect. However, the Telcos' proposals would address only the *output* of the problem instead of the *inputs* – the data provided to the disinterested and impartial state mapping contractors to create the Map. Efforts should be made to address problems at the source, without subjecting the Commission and its regulatees to disputes and administrative processes that rely entirely on the claims of interested parties.

Pursuant to Section 1.1206 of the Commission's Rules, this notice is being filed via ECFS in the above-referenced proceedings. Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

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