

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

In the Matters of)	
)	
Competitive Bidding Procedures for Mobility Fund Phase I Auction 901)	AU Docket No. 12-25
)	
Universal Service Reform Mobility Fund)	WT Docket No. 10-208

To: The Commission

COMMENTS OF C T CUBE, L.P. DBA WEST CENTRAL WIRELESS

C T Cube, L.P. dba West Central Wireless (“WCW”), by its attorneys, hereby submits comments on the potential eligibility of certain census blocks for Mobility Fund Phase I support. Specifically, WCW will demonstrate that a significant number of census blocks in western and central Texas (the “WCW Market”)¹ identified by the Federal Communications Commission (“FCC” or “Commission”) in its *Public Notice* released February 10, 2012² as being unserved by 3G or better service are in fact served by WCW and therefore should be removed from the list of census blocks included in the forthcoming Auction 901.

In calculating which census blocks within the WCW Market are served by 3G or better mobile wireless service, the Commission relies upon coverage propagation maps generated by individual mobile service providers which were then aggregated by Mosaik Solutions f/k/a American Roamer (“Mosaik”). The Commission’s most recent interactive map suggests that there are a total of 17,277 unserved census blocks in these seven CMAs. However, the maps created by Mosaik and relied upon by the Commission do not incorporate coverage propagation

¹ The WCW Market includes numerous counties in the following Cellular Market Areas (“CMAs”): Abilene (CMA220), San Angelo (CMA294), TX-8 (CMA659), TX-9 (CMA660), TX-14 (CMA665), TX-15 (CMA666) and TX-18 (CMA669).

² “Mobility Fund Phase I Auction, Updated List of Potentially Eligible Census Blocks”, Public Notice, DA 12-187 (released February 10, 2012) (“*Public Notice*”).

maps furnished by WCW. Today, WCW has in fact deployed 3G or better service to 10,762 of the 17,277 census blocks provided by the Commission in the WCW Market. Attachment A consists of seven separate maps. Each map displays WCW's current 3G coverage propagation in each CMA of the WCW Market. The WCW coverage is set against a map of the unserved census blocks in the various counties. The combined maps clearly depict 3G or better mobile wireless service provided by WCW in a total of 10,762 unserved census blocks. Attachment B lists each of the 10,762 census blocks in the WCW Market where WCW today provides 3G mobile wireless services. For all of these reasons, the 10,762 census blocks originally deemed "unserved" by the Commission should instead be redesignated as "served" and accordingly removed from inclusion in Auction 901. WCW believes that the Commission's decision to award \$300 million in Mobility Fund Phase I support will help bring mobile broadband to rural markets where it is truly needed today. However, these scarce funds should be targeted towards other rural markets in the United States clearly lacking 3G services or the prospects for 3G or higher services.

Respectfully submitted,

C T CUBE, L.P. DBA WEST CENTRAL WIRELESS

By: */s/ Caressa D. Bennet*

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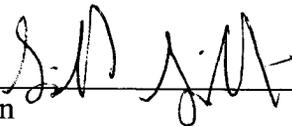
Its Attorneys

March 16, 2012

DECLARATION OF GRIFF GRIFFIN

I, Griff Griffin, do hereby declare under penalty of perjury under the laws of the United States of America, the following:

1. I am the Technical Operations Manager of C T Cube, L.P. dba West Central Wireless.
2. I have read the foregoing Comments. I have personal knowledge of the facts and representations set forth herein, and believe them to be true and accurate.



Griff Griffin

16 MAR 2012

Date