



## DISCUSSION

The Wireless Telecommunications and Wireline Competition Bureaus (“Bureaus”) have released a revised list of census blocks that are potentially eligible for Mobility Fund Phase I support,<sup>4</sup> and have indicated that “if commenters think certain blocks not included in the revised list should be eligible for support, they should indicate which blocks and provide supporting evidence.”<sup>5</sup>

SBI has reviewed the Bureaus’ revised list and related maps<sup>6</sup> of potentially eligible census blocks located in the northwestern region of the State of New Mexico, and has determined that numerous census blocks in the region of New Mexico that SBI has examined have been excluded from the Bureaus’ revised list but in fact should be included as potentially eligible census blocks because none of the census blocks in question is covered by a current or next generation mobile network.

Specifically, SBI has undertaken drive tests in the northwestern region of the State of New Mexico, and these drive tests have revealed significant portions of the Eastern Navajo Agency of the Navajo Nation (“Eastern Agency”) in the State of New Mexico in which there is no coverage provided by current or next generation mobile networks.

As described in greater detail in the Declaration of Guy B. Turley,<sup>7</sup> the SBI drive tests traversed the principal highways located in the Eastern Agency,<sup>8</sup> and discovered a significant number of locations, in the service areas of AT&T and Verizon Wireless, in which no 3G service

---

<sup>4</sup> *Mobility Fund Phase I Auction, Updated List of Potentially Eligible Census Blocks*, AU Docket No. 12-25, Public Notice, DA 12-187 (rel. Feb. 10, 2012) (“*February 10 Public Notice*”). A summary of the Public Notice was published in the Federal Register at 77 Fed. Reg. 9655 (Feb. 17, 2012).

<sup>5</sup> *February 2 Public Notice* at para. 19.

<sup>6</sup> See *February 10 Public Notice* at para. 6.

<sup>7</sup> See Exhibit A.

<sup>8</sup> See Exhibit B.

is currently available.<sup>9</sup> The results of the drive tests have been confirmed by SBI by comparing the areas identified as having no coverage with service coverage maps available at the websites of AT&T, Verizon Wireless, and other wireless carriers.

SBI is continuing to refine the results of its drive tests for purposes of identifying specific census blocks in the Eastern Agency in which there is no coverage provided by current or next generation mobile networks, and SBI will submit a listing of these census blocks to the Bureaus as soon as this work is complete.

SBI respectfully requests the Bureaus to review the findings of the drive tests conducted by SBI, and to include areas identified by SBI as lacking coverage on the Bureaus' revised list of census blocks that are potentially eligible for Mobility Fund Phase I support.

Respectfully submitted,

SMITH BAGLEY, INC.



By: \_\_\_\_\_

David A. LaFuria  
John Cimko

LUKAS, NACE, GUTIERREZ & SACHS, LLP  
8300 Greensboro Drive, Suite 1200  
McLean, Virginia 22102  
(703) 584-8678

March 26, 2012

---

<sup>9</sup> See Exhibit C. The areas on the maps in Exhibit C marked by red dots reflect areas in which no 3G service could be obtained on wireless devices used by SBI personnel conducting the drive tests.

**EXHIBIT A**

**DECLARATION OF GUY B. TURLEY**

**DECLARATION OF GUY B. TURLEY**  
**IN SUPPORT OF**  
**SMITH BAGLEY, INC., REPLY COMMENTS**

My name is Guy B. Turley. I am presently the Director of Engineering and Technical Operations for Smith Bagley, Inc. (“SBI”) d/b/a CellularONE, having held that position since 2010. My responsibilities have included the establishment of site development strategies that are responsive to the competitive marketplace, and the management of core equipment modernization upgrades. I was responsible for supervising the drive tests described in the Reply Comments and in this Declaration.

I have over 20 years of operational and telecommunications management experience. Prior to assuming my current position at CellularONE, I was employed by T-Mobile USA for more than a decade, holding several positions there, including Network Engineering Manager and Operations Manager, and General Manager, Engineering and Operations.

My education and experience include an Associate of Arts degree, and a Bachelor of Science degree in Business Management and Finance, from Brigham Young University. I have also served on the Steering Committee for the Arizona Wireless Association.

I provide the following Declaration to support the factual statements contained in the Reply Comments submitted by SBI in response to the *February 2 Public Notice*.

SBI engineering technicians conducted drive tests throughout the Eastern Navajo Agency of the Navajo Nation (“Eastern Agency”) in the State of New Mexico, for the purpose of deter-

mining the extent to which 3G wireless service available at numerous points along principal highways and major roads in the Eastern Agency.

For purposes of conducting these tests, data plan subscriptions for both AT&T and Verizon Wireless services were purchased and activated, and wireless handset devices (a Pantech Burst 3G/4G device for use with AT&T's service, and a Pantech Breakout device for use with Verizon Wireless's service) were also acquired.

The technicians planned routes for testing (which are illustrated in Exhibit B of the Reply Comments), based on their knowledge of routes and roadways in the Eastern Agency and adjacent areas with relatively high levels of traffic volume.

The methodology for the drive tests was as follows: The technicians drove along each planned route. At five-mile intervals, the technicians stopped and attempted to perform a data session with the wireless device, and documented the results, including a listing of the longitudes and latitudes of each testing location.

The information collected from the drive tests was then entered into spreadsheets, reviewed, analyzed, and used as the basis for preparing the maps displayed in Exhibit C of the Reply Comments. Part of the analysis undertaken by the engineering technicians involved overlaying the various data collection points on the map of potentially eligible census blocks made available by the Wireless Telecommunications and Wireline Competition Bureaus. Finally, the engineering technicians, as a means of confirming the accuracy of the drive tests, compared the areas identified by the drive tests as having no coverage with mobile wireless service coverage maps publicly available at the websites of AT&T, Verizon Wireless, and other wireless carriers. This comparison did in fact confirm the accuracy of the drive test results.

I declare that the foregoing is true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Guy B. Turley", written in a cursive style.

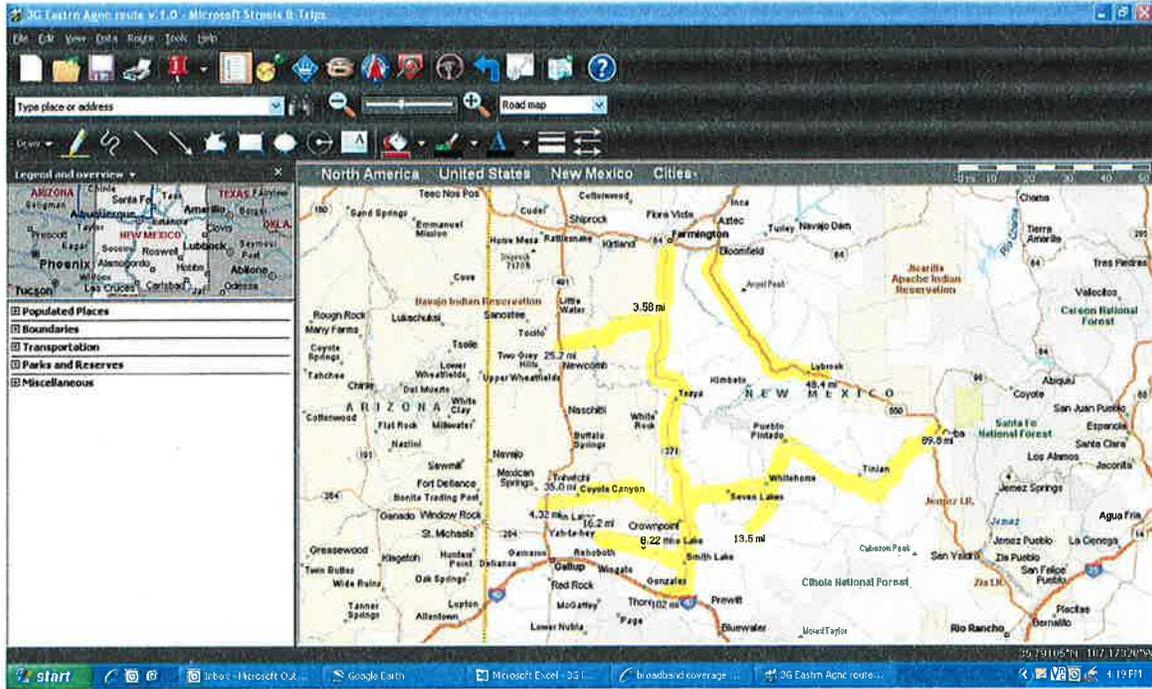
---

Guy B. Turley

March 26, 2012

**EXHIBIT B**  
**MAP OF DRIVE TEST ROUTES**

# 3G Eastm Agnc route



**EXHIBIT C**

**MAPS SHOWING TEST RESULTS**

