

EXHIBIT D

DECLARATION OF ALI KUZEHKANANI

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IN SUPPORT OF SMITH BAGLEY, INC. COMMENTS

My name is Ali Kuzehkanani. I am presently the Director of Engineering at Lukas, Nace Gutierrez & Sachs, LLP. My responsibilities are to provide technical and strategic support to wireless licensees operating using variety of spectrum and technologies.

I graduated from George Washington University, Washington, D.C., with a Bachelor of Science degree in Electrical Engineering.

I provide the following Declaration to support the factual statements contained in the Comments submitted by SBI in response to the FCC's recent Public Notice seeking comment on upcoming Auction 902 for tribal lands.

My task was to take drive test data provided by SBI's engineering team and produce a map that accurately and fairly depicts the coverage results produced by the drive tests. Here, I explain what the maps show.

The map depicts a composite of coverage from all carriers advertising 3G or better service in the region. In producing a final map, I have depicted the areas where service is available, that is, where either downlink or uplink speeds meet or exceed the 200/50 threshold in the location. Areas where neither speed threshold is met fail to provide useful 3G service and are depicted in the map as unserved. This testing standard is consistent the FCC's coverage standard, established in the CAF Order for recipients of Mobility Fund support.

There are a number of reasons why an area could be shown to have coverage in a Mosaik database, but still be properly included in Auction 902. For example, advertised coverage may be developed through a predictive model that is subject to a number of user inputs that may not

be consistent with equipment specifications actually deployed in the field. Downlink coverage may be modeled to occur over a wide area; however, 3G uplink speeds may be insufficient. That is, the cell tower has enough power to transmit data to the handset, but the handset radio is not strong enough to reach the tower, and data cannot be uplinked until the handset moves closer to a tower. In this scenario, 3G service is not available.

The only way to demonstrate what is actually going on in the field is through a drive test. And even then, mapping drive test results is not a perfect science. There are limitations on the data that can be depicted on a map. In the attached map, I cannot say that there is no coverage in the region. Moreover, in areas where the map shows no coverage, there may be points where a device could connect up to the tower at acceptable speeds, either briefly in a mobile mode or continually in a fixed mode.

That said, I can state unequivocally that the road areas depicted in red on the attached map cannot achieve consistent 3G connectivity in a mobile environment. Despite the fact that there could be small areas where a device connects, a user cannot travel down any of the roads depicted in red and obtain a consistent 3G connection. In many areas there was no service. In others, service was consistently below 3G. In other areas, service was so intermittent that test equipment could not generate readings sufficient to produce a green dot on the map.

In sum, if one were traveling down these roads, 3G service is either completely unavailable or the user can only obtain an intermittent connection that does not allow a user to conduct a data session (2G, 3G or 4G) in a mobile environment. The most common solution to poor coverage such as this is additional investment to build enough cell towers to fill in dead zones and enable a consistent connection in a mobile environment.

Based on the drive test results as described above, we have identified a set of 2010 census blocks that should be included in Auction 902. As demonstrated by the drive test results, the census blocks listed on Exhibit B meet the FCC's requirement for eligibility due to lack of required 3G service. The list of the proposed census blocks includes the census blocks where the drive test was conducted as well as the neighboring census blocks which will have similar type coverage. Since the drive test results showed lack of consistent 3G service along the roads, which are typically the areas targeted for coverage, it is likely that neighboring census blocks would also lack consistent 3G service.

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


Ali Kuzehkanani

May 10, 2013