RWA/NTCA Aggregated PEA Proposal

Legal Basis

- **47 USC § 309(j)-** In specifying the characteristics of licenses and permits subject to auction the FCC *SHALL* promote the following objectives:
  - The rapid deployment of new technologies to those residing in rural areas
  - Avoiding excess concentration of licenses by disseminating licenses to RURAL TELEPHONE COMPANIES
  - Prescribe area designations that promote economic opportunities for RURAL TELEPHONE COMPANIES
  - Ensure that RURAL TELEPHONE COMPANIES have the opportunity to participate in the provision of spectrum based services

Why not an existing map?

- EAs do not satisfy 309(j) and are not a compromise between nationwide licenses and CMAs
- CCA PEA map works well for some, but is no better than EAs for the most rural areas
- RWA and NTCA continue to believe CMAs are the best fit for competitive bidding

Guiding Principles

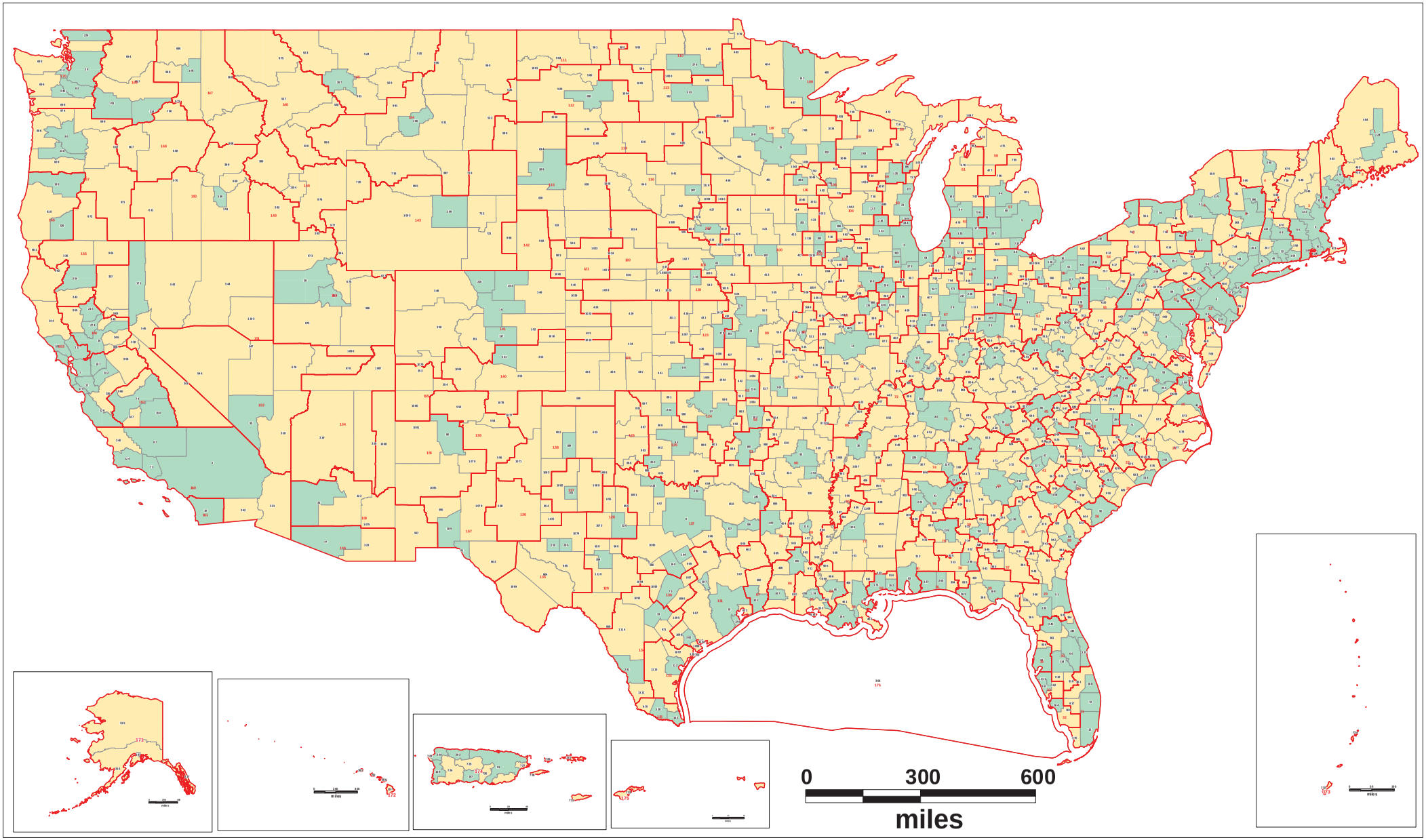
- Create areas to ensure rural consumers will be served
- Keep rural and metropolitan areas separate, as much as possible
- Create no islands of extremely rural territories
- Recognize that some areas are out of reach for small providers, no matter how small the geographic license
- All licenses must “nest” within EAs
- Must have less than 500 total areas due to Incentive Auction complexities

Methodology

- Create a basic PEA map of CMAs within EAs (1,118) for use in future auctions
  - Building Block of 600 MHz “PEA Pod” map
- Combine CMAs in metropolitan areas and where split CMAs now too small for viable business plan
- Seek feedback from member companies and industry about appropriate PEA Pod boundaries, based on population, topography, current service availability
- Harmonize with CCA map wherever possible

RWA

1,118 PEAs



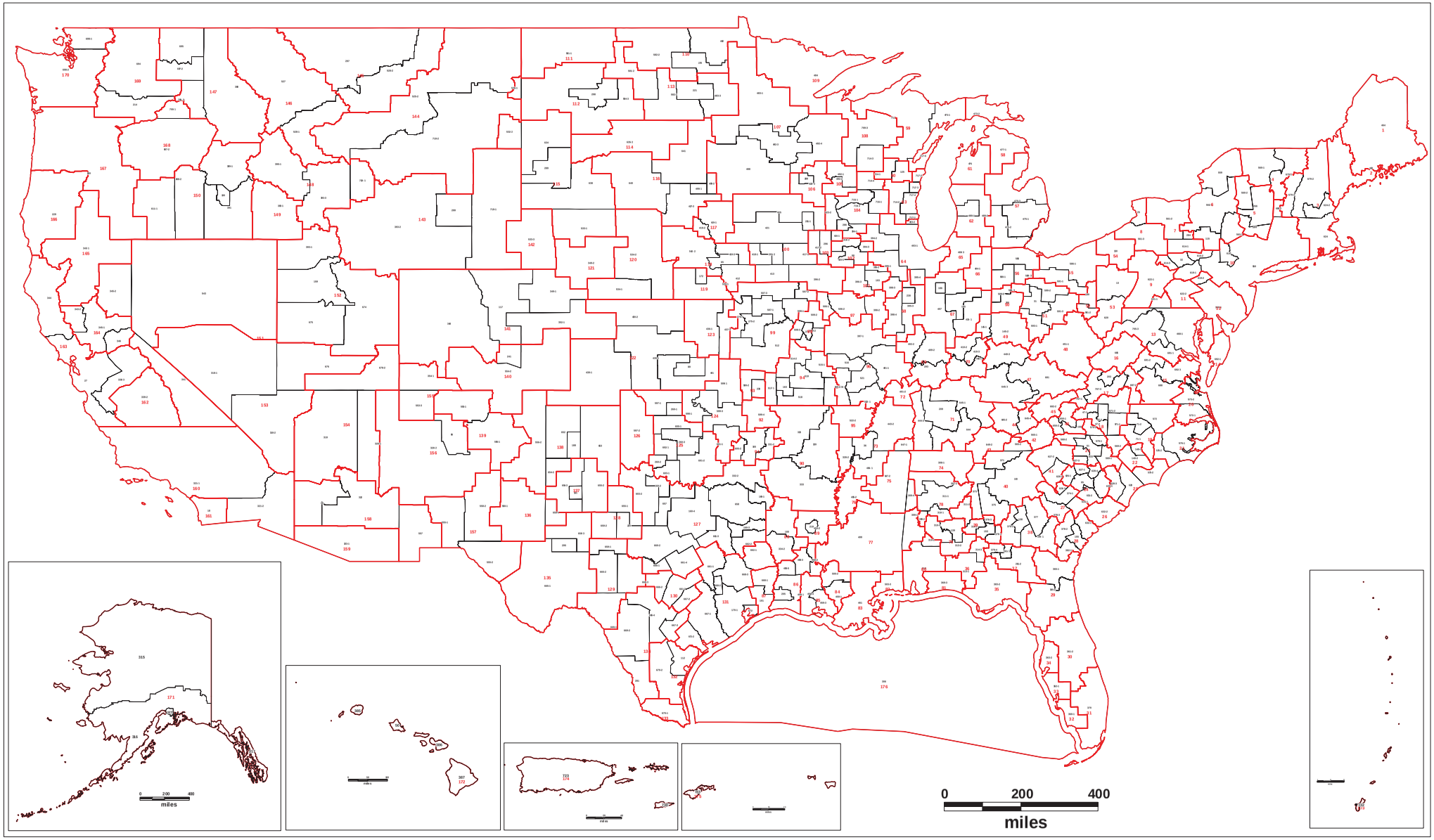
February 24, 2014

Economic Area (EA)

PEAs

RWA
RURAL WIRELESS ASSOCIATION

Proposed Aggregated PEAs for 600 MHz Auction



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Economic Area (EA)

Aggregated PEAs