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May 22, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Wireline Competition Bureau Seeks Focused Comment on E-rate Modernization; WC
Docket No. 13-184**

Dear Ms. Dortch:

On May 21, 2014, Don Horsley, CEO and President, and Michael Rosenthal, Director of Legal and External Affairs, both of SouthernLINC Wireless, Sara Kuehnle, Dentons US LLP, and I met with Julie Veach, James Bachtell, Trent Harkrader, and Lisa Hone of the Wireline Competition Bureau, Dana Shaffer of the Office of the Managing Director, and Jonathan Chambers of the Office of Strategic Planning and Policy Analysis to discuss the points set forth in the attached presentation and the comments and reply comments that SouthernLINC Wireless filed in the above-referenced proceeding on Monday, April 7, 2014, and Monday, April 21, 2014, respectively. During the conversation, we also discussed SouthernLINC Wireless's deployment of upgrades to their network and service area, and how these upgrades will benefit recipients of E-rate funding.

During the meeting, SouthernLINC Wireless was asked about the level of competition for E-rate supported projects in its service area. In many states, bidders do not have access to the identities of other bidders or the details of their bids. In Alabama, however, the identities of the bidders and relevant details of their bids are available to the other bidders. Based on this information, SouthernLINC Wireless can confirm that AT&T, Verizon and SouthernLINC Wireless compete for most bids in Alabama, and that bidders frequently lower their bids in response to bids submitted by other bidders. This demonstrates that the availability of E-rate funding does not insulate carriers from competitive forces, the benefits of which schools and libraries continue to enjoy. By contrast, if E-rate funding for wireless services were eliminated, any resulting reduction of demand for those services would make it even harder for regional wireless carriers to compete with AT&T and Verizon, which could in turn lead to higher prices for all consumers in those areas.

Various schools that rely on SouthernLINC Wireless services have filed comments in this proceeding to emphasize how crucial wireless services are to meeting the needs of rural schools and libraries.¹ In addition to the educational benefits that wireless services provide, wireless services facilitate critical communications among staff, students and parents, and they often constitute the only means for staying in contact with bus drivers and law enforcement to ensure the safety of the students, especially in times of emergency. Wireline-based broadband services, even when combined with VoIP services, simply cannot meet all of the communications needs that wireless services currently meet.

¹ See, e.g., Comments of John Wilcox at 1; Comments of John Mascia, President, Alabama Institute for Deaf and Blind, at 1; Comments of Glenda Wilson, Technology Coordinator, Walker County School District at 1; Comments of John P. Wilcox, Assistant Superintendent, Tallapoosa County Schools, at 1.

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Eliminating support for wireless voice services could also interfere with the Commission's goal of expanding broadband penetration.² As the Alabama Institute for Deaf and Blind, which relies upon SouthernLINC Wireless services, has explained:

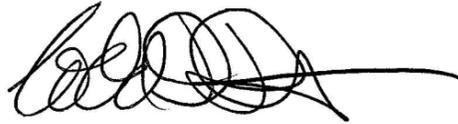
In most instances, funding is a zero-sum game for most schools. If the voice services schools desire no longer receive E-Rate support, schools are left with little choice but to offset this change by reducing the amount they otherwise planned to spend elsewhere, including broadband expansion, which would be a real travesty.³

Therefore, elimination of support for voice services would not help the Commission achieve its goal of widespread broadband connectivity.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter and the attached presentation are being filed *via* ECFS for inclusion in the public record for the above-referenced proceeding.

Please contact the undersigned if you have any questions or need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Todd D. Daubert', with a long horizontal flourish extending to the right.

Todd D. Daubert
Counsel for SouthernLINC Wireless

cc: Julie Veach
James Bachtell
Trent Harkrader
Lisa Hone
Dana Shaffer
Jonathan Chambers

² Comments of Glenda Wilson, Technology Coordinator, Walker County School District at 1 ("Elimination of E-rate support for voice services, including wireless voice services, will not contribute to the Commission's stated goal of expanding broadband penetration in schools and libraries.").

³ Comments of John Mascia, President, Alabama Institute for Deaf and Blind, at 1.