

## EXHIBIT A

I, Dr. Raul L. Katz, provide the following declaration pursuant to 47 C.F.R. § 1.16:

1. My name is Dr. Raul L. Katz. I am President of Telecom Advisory Services, LLC, an international consulting firm specializing in providing advisory services in business, policy and financial strategies to telecommunications and technology companies, governments and international organizations. Before founding Telecom Advisory Services, I was a Lead Partner at Booz Allen Hamilton and CEO of Adventis, a telecommunications consulting company. I am a Director of Business Strategy Research at Columbia University's Center for Tele-Information, an Adjunct Professor in Columbia Business School's Division of Finance and Economics, and a Visiting Professor at the Universidad de San Andres in Argentina. I have written three books on the telecommunications industry, and have published articles in journals including Telecommunications Policy, Telephony, Strategy and Business, Communications and Strategies, Intereconomics, America's Network and The Information Society. I hold a Ph.D. in Management Science and Political Science and an M.S. in Communications Technology and Policy from the Massachusetts Institute of Technology (MIT).

2. I have been retained by Competitive Carriers Association (CCA) to assemble a collection of data for a number of states to analyze mobile broadband coverage at a county level for these states, the quality of mobile broadband service experienced in these areas, and the rigor of competitive offerings of mobile broadband services in the selected sample area. This examination is undertaken in response to assumptions underlying the Federal Communications Commission's (Commission) recent Further Notice of Proposed Rulemaking (FNPRM) with

respect to funding mechanisms for Phase II of the Connect America Fund and Mobility Fund.<sup>1</sup> I am currently researching for and drafting a comprehensive report for later release, but provide some preliminary data herein.

3. In the FNPRM, the Commission claims that “according to some sources, nearly 99.5 percent of the U.S. population today (and the road miles associated with that population) is covered by some form of mobile broadband technology,” though the Commission admits that this is likely an overstatement.<sup>2</sup> My initial review of available data, including the National Broadband Map, Connected Nation and other crowdsourcing databases, however, shows that rural wireless broadband coverage, and service offerings at download speeds above 3 Mbps in the states sampled often fall below 90 percent. Indeed, wireless coverage in rural counties ranges as low as 76.7 percent of the population in West Virginia and 81.1 percent in North Carolina. Furthermore service coverage at download speeds at or above 3 Mbps ranges as low as 78.6 percent in Kentucky and 86.3 percent in New Hampshire.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 8, 2014 in Stanfordville, New York.



Dr. Raul L. Katz  
President, Telecom Advisory Services, LLC

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<sup>1</sup> Connect America Fund, Universal Service Reform – Mobility Fund, *et al.*, WC Docket Nos. 10-90, 10-208 *et al.*, *Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking*, FCC 14-54 (rel. June 10, 2014) (“FNPRM”).

<sup>2</sup> FNPRM ¶ 238, n.436.