



February 16, 2017

**Via ECFS**

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

**RE: NOTICE OF EX PARTE**  
**WT Docket No. 10-208: *Universal Service Reform – Mobility Fund***  
**WC Docket No. 10-90: *Connect America Fund***

Dear Ms. Dortch,

After consulting with its engineering and technical experts, the Rural Wireless Association, Inc. (“RWA”) writes in response to a February 15, 2017 *ex parte* filing by AT&T Services, Inc. (“AT&T”).<sup>1</sup> AT&T noted that it “understand[s] there is some concern that the quality of the data is not appropriate for this purpose because of the uncertainty over whether carriers are submitting Form 477 data in a consistent manner.” AT&T further stated that, despite not being required to do so, it would take the opportunity to disclose that its Form 477 Mobile Broadband Deployment data and Mobile Voice Deployment data as of June 2016 used coverage boundaries at a resolution of 90 meters.<sup>2</sup>

Unfortunately, this information provides little insight into how accurately Form 477 data represents the real world. Indicating that a 90 meter boundary resolution is the only item necessary to ensure accurate Form 477 data requires a long leap of faith that a carrier uses modeling tools that closely represent actual value in the field. In actuality, the 90 meter boundary resolution is only one small part of the total information needed to predict reasonable RF modeling results.

To understand the true relevance of the 477 data, carriers would need to provide the following list of assumptions used in its coverage model:

- Propagation model used;
- Fade margin applied to take it above 50% reliability;
- Clutter data and its resolution;
- Resolution of terrain data; and

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<sup>1</sup> [Letter](#) from Mary L. Henze, AT&T, to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 10-208, WC Docket No. 10-90 (Feb. 15, 2017).

<sup>2</sup> *Id.*

- Bin size as provided above.

Only with this all of this information can one make any general assumptions that data offered in a Form 477 filing is relevant to a prediction in the field.

RWA continues to have serious concerns about the lack of a common coverage standard governing Form 477 data, and the negative impact this could have on area eligibility determinations and the challenge process. Nothing could be more wasteful than committing almost \$5 billion in support over ten years to a process that uses admittedly flawed data that misallocates support to areas that don't need it, or distribute it an inefficient manner. Failing to improve the Form 477 data ahead of the challenge process will result in incorrect eligibility determinations and render the challenge process prohibitively expensive, nearly impossible to undertake, and ultimately ineffective. RWA urges the commission to fix the Form 477 data, seek public comment on the challenge process, and then move forward with a mechanism that will sustain and advance the availability of mobile services in high-cost areas.

Pursuant to Section 1.1206 of the FCC's Rules, 47 C.F.R. § 1.1206, this *ex parte* is being filed electronically with the Office of the Secretary.

Respectfully submitted,

/s/ Caressa D. Bennet

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