

# United States Senate

WASHINGTON, DC 20510

November 14, 2016

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Wheeler,

On September 30, 2016, the Commission released a mobile broadband coverage data report. The report revealed that nearly one and a half million people in the U.S. still lack access to 4G LTE coverage. It is clear that substantial work remains to achieve universal service, especially in rural America. We applaud the Commission's efforts to advance Phase II of the Universal Service Fund's Mobility Fund (Phase II), and we encourage the Commission to expeditiously address the following issues as this proceeding moves forward.

First, the Commission should fully consider the issues posed by the failure to support both GSM and CDMA networks. While we support targeting funds to unserved areas, eliminating support in areas where *either* a GSM or CDMA network is operational will leave some customers unable to make or receive voice calls. This poses significant public safety issues, especially in rural areas of Montana where customers heavily rely on voice service.

Second, as several Senators noted in a letter earlier this year, there is a significant disparity between FCC statistics regarding coverage and our constituents' real-world experiences. The mobile broadband coverage data report relied on Form 477 data to identify areas that need ongoing USF support. However, we are concerned that the analysis may overstate coverage due to the lack of standardization in reporting as well as carrier-reported data limitations. We urge the Commission to adjust Form 477 reporting and allow for a robust challenge process as it moves forward with Phase II.

Finally, it is our understanding that the Commission plans to use a reverse auction model to distribute Phase II funding. Reverse auctions place communities with mountainous or otherwise challenging terrain at a distinct disadvantage to other rural communities in winning funding. We also understand that the Commission plans to delegate authority to the Wireless Telecommunications Bureau (Bureau) to consider a terrain bidding credit for the auction. We support such a bidding credit and urge the Bureau to give it serious consideration so that all areas of the country have a meaningful opportunity to receive support.

We appreciate your efforts and look forward to working with you to ensure that all Americans have access to adequate mobile services.

Sincerely,

Handwritten signature of Steve Daines in blue ink.

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STEVE DAINES  
United States Senator

Handwritten signature of Jon Tester in blue ink.

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JON TESTER  
United States Senator