

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Inquiry Concerning Deployment of Advanced) GN Docket No. 18-238
Telecommunications Capability to All Americans)
In a Reasonable and Timely Fashion)

**COMMENTS
OF
WTA – ADVOCATES FOR RURAL BROADBAND**

WTA – Advocates for Rural Broadband (“WTA”) hereby files its Comments with respect to the Commission’s *Fourteenth Broadband Deployment Report Notice of Inquiry*, FCC 18-119, released August 9, 2018 (“*NOI*”).

WTA, a national trade association that represents more than 340 rural incumbent local exchange carriers (“RLECs”), will address only the question in paragraph 11 of the *NOI* regarding “whether and to what extent fixed and mobile services of similar functionality are substitutes for each other.”

WTA and its RLEC members note that significant portions of Rural America still have only or predominately fixed wireline or fixed wireless service. Where rural and other areas have access to both fixed and mobile services, WTA and its members have long found, and continue to find, that such services are far more complementary than competitive with each other.

Throughout many of the more remote and sparsely populated portions of Rural America, mobile wireless service is currently intermittent, spotty or nonexistent. During the Senate Committee on Commerce, Science, and Technology’s recent August 16, 2018 hearing on Oversight of the Federal Communications Commission, Senator Jon Tester of Montana spoke of

his personal experiences of being able to send texts only at certain times of day (“depending on where the sun is in the sky”) and only from certain sides of his home, and of being able to get voice calls only when he is driving his tractor in certain directions. He noted the difficulties of convincing wireless carriers to provide 5G mobile wireless services in Billings, Montana’s largest community, while emphasizing that many portions of Montana have “no G” service now and little hope of getting substantial mobile wireless service within the foreseeable future.

Many WTA members have had similar experience with mobile wireless services.¹ In a lot of rural areas, there tends to be significant mobile wireless service available only in larger communities and along major interstate and regional highway segments where substantial roaming traffic can be found. However, mobile coverage diminishes or disappears as terrain becomes more rugged and as one moves further away from the main communities and thoroughfares.

In urban areas and in rural areas where significant mobile wireless service is available, fixed wireline (and wireless) services utilize different equipment and technologies than mobile wireless services, and are used by customers for different purposes and at different times and places. For example, virtually all urban and rural businesses subscribe to single-line or multi-line fixed voice and broadband service from a wireline carrier, while many of their employees carry business or personal mobile wireless devices. Such employees may use fixed wireline broadband service at work and at home, fixed wireline or mobile wireless voice service at work and home, and mobile wireless broadband and voice service while traveling and commuting. Similarly, many American households continue to subscribe to both fixed wireline and mobile wireless services. The typical American household subscribes to fixed service for Internet access, while individual household members (including adolescents and increasingly younger children) often

¹ In contrast, some RLECs or their affiliates have obtained radio licenses and have constructed and operate substantial mobile or fixed wireless networks that serve significant portions of their wireline exchange areas.

have their own mobile wireless phones and/or notebooks. Moreover, even where household members employ mobile wireless devices to access broadband services, they frequently transfer to a home or other local WiFi network (which is typically a wireline network with a wireless router attached) whenever possible in order to avoid wireless data caps and overage charges. In addition, many mobile wireless base stations and towers are connected to the public network via fixed wireline special access facilities.

These differences, as well as the trade-offs that end-users are willing to make regarding service matters such as speed, capacity, file size, screen size and mobility, mean that fixed wireline (and fixed wireless) facilities and services continue to play separate but complementary roles vis-a-vis and mobile wireless facilities and services in today's public network and are likely to continue to do so during the foreseeable future.

Hence, to answer the Commission's question, fixed and mobile services of similar functionality continue to be complements – rather than substitutes -- for each other.

Respectfully submitted,
WTA – Advocates for Rural Broadband

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Dated: September 10, 2018