



August 24, 2020

via ECFS

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

RE: NOTICE OF EX PARTE
GN Docket No. 20-32 – *Establishing a 5G Fund for Rural America*

Dear Ms. Dortch:

On August 20, 2020, the Rural Wireless Association, Inc. (“RWA”) and NTCA – The Rural Broadband Association (“NTCA”) representatives listed in Attachment A met by videoconference with the Federal Communications Commission (“FCC” or “Commission”) representatives listed in Attachment B. The attendees discussed the “Phase 0” proposal for awarding support in response to the FCC’s NPRM to establish a 5G Fund for Rural America (“5G Fund”) which is summarized in the attachment to this filing. The participants discussed the creation of their Phase 0 proposal that would allow rural carriers currently receiving frozen legacy support to continue to receiving legacy support at increased levels totaling \$1.5 billion over 10 years in exchange for 5G deployment commitments in their legacy support areas within Rural-Urban Commuting Area (“RUCA”) codes 5-10. Phase 0 would be limited to legacy support carriers with 500,000 or fewer subscribers and targeted in a way that ensures that no area receives duplicative support.

Participants noted that thus far, 5G has only been deployed in select portions of select urban areas and that to date no one has deployed 5G in RUCAs 5-10.¹ Give the delay anticipated to bring 5G to rural America, rural consumers and those traveling through rural America will immensely benefit from the Phase 0 proposal by jumps starting rural 5G service to provide telehealth, precision agriculture services for farms and ranches as well as increased efficiencies for ranching, oil and gas production and sustainable energy production for solar farms, wind farms, and hydraulics. Accordingly, funding deployment of 5G in rural areas in the near term, by adopting the Phase 0 proposal, would benefit all Americans who are dependent on these resources.

The parties also discussed the impact of using either Option A or Option B in Phase 1 of the 5G Fund and how the total funding allocated would be affected by the addition of a Phase 0. Under the Phase 0 proposal, \$1.5 billion would be allocated for Phase 0 with \$6 billion allocated for Phase 1 and \$1.5 Billion allocated for Phase II. RWA noted that Option A should be used for

¹ See RWA Comments, WC Docket No. 20-32 (filed June 25, 2020), at pg. 2.

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Phase I and Option B should be used for Phase II while NTCA believed Option B should be used for both Phase I and Phase II. RWA alternatively suggested that the amount of funding for Phase I could be lowered to \$3 billion using Option A keeping the total funds roughly the same as those previously allocated for the Mobility Fund Phase II (hence no new funding) allowing the Commission to proceed more quickly with a reverse auction for Phase I prior to mapping being completed (given that RUCAs 5-10 are known not to have 5G services). Phase II could then have \$4.5 billion allocated and be held after the completion of mapping.

RWA clarified that in instances where there is the potential for overlapping support, competing legacy carriers will have to negotiate a solution where only one carrier is eligible for support, and if unable to do so, those legacy support areas will be eligible for auction in Phase 1 and not allowed support in Phase 0.

Pursuant to Section 1.1206 of the Commission's Rules,² this ex parte is being filed electronically with the Office of the Secretary.

Respectfully submitted,

/s/ Carri Bennet

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cc: Michael Janson
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Jonathan Campbell
Margaret Wiener
Kelly Quinn
Valerie Barrish
Patrick DeGraba
Alexander Minard
Patrick Sun
Jesse Jachman
Emily Burke
Nicholas Copeland

² 47 C.F.R. §1.1206.

Attachment A – RWA/NTCA Representatives

Carri Bennet	General Counsel
Stephen Sharbaugh	Legislative and Policy Analyst
Michael Bennet	Womble Bond Dickinson
Jill Canfield	NTCA – The Rural Broadband Association
Jana Wallace	Panhandle Telephone Cooperative, Inc.
Kelley Wells	Panhandle Telephone Cooperative, Inc.
Justin Brewster	Pioneer Cellular
Jeff Smith	GVNW Consulting, a Vantage Point Company
Chad Duval	Moss Adams
John Nettles	Pine Belt Communications
Jake Baldwin	Cross Wireless
Ajapol Anusornpanich	Monte R. Lee & Company

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Attachment B – FCC Representatives

Michael Janson (OEA)
Jonathan McCormack (OEA)
Audra Hale-Maddox (OEA)
Kirk Burgee (WCB)
Jonathan Campbell (OEA)
Margaret Wiener (OEA)
Kelly Quinn (OEA)
Valerie Barrish (OEA)
Patrick DeGraba (OEA)
Alexander Minard (WCB)
Patrick Sun (OEA)
Jesse Jachman (WCB)
Emily Burke (OEA)
Nicholas Copeland (OEA)

Executive Summary of RWA 5G Phase 0 - “5G Small Carrier Fund”

RWA proposes adding a phase prior to the 5G Phase 1 auction process to accelerate 5G deployment in targeted rural areas.

Who is eligible for Phase 0?

Carriers, with 500,000 or fewer subscribers, currently receiving legacy support.

What commitment is required?

In exchange for increased funding above the current frozen 60% legacy benchmark to 90% of the benchmark, Phase 0 carriers commit to build out 5G wireless networks.

Where is Phase 0 support targeted?

Phase 0 support would be targeted to areas defined as rural using Rural-Urban Commuting Area (RUCA) codes 5-10.

Term of Support?

Ten years, the same as the 5G fund Phase 1 support.

Specifications on level of coverage?

Required to deploy 5G 3GPP Release 15 or higher by year 4 (based on 40% of the geography), 3GPP Release 17 or higher by year 8 (based on 60% of the geography) and 75% by year 10 (based on geography) utilizing 7/1 Mbps at the cell edge and 35/3 Mbps within the defined predicted area.

Limitations?

No overlaps in support. To the extent eligible rural carriers are receiving overlapping support today, they would allocate support using an allocation methodology based on the percentage of geography, road miles and/or the number of POPs covered to separate out overlapping areas based on census tracts or risk loss of support for the areas of overlap and having the area go to auction. Additionally, RWA proposes to not have the FCC’s adjustment factors applied to Phase 0 support.

Why does RWA offer the Phase 0 proposal?

Rural carriers are uniquely suited to embark on this important task as they have proven records in deploying commercial, next-generation wireless networks with their highly trained, local workforce and have existing knowledge of local community needs.

Key Statistical Data

Amount of 5G Fund allocated to Phase 0	\$1,500,000,000
Corresponding level of legacy support for those areas	90%
Increase in legacy support (over 10-year term) from 60% to 90% level	\$489,147,290
Geographic area to be covered with 5G in exchange	60,000 sq. miles (roughly Georgia)