
Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Facilitating the Provision of Spectrum-Based) WT Docket No. 02-381
Services to Rural Areas and Promoting)
Opportunities for Rural Telephone Companies)
To Provide Spectrum-Based Services)
)
2000 Biennial Regulatory Review) WT Docket No. 01-14
Spectrum Aggregation Limits For Commercial)
Mobile Radio Services)

Increasing Flexibility to Promote Access to) WT Docket No. 03-202
and the Efficient and Intensive Use of)
Spectrum and the Widespread Deployment of)
Wireless Services, and to Facilitate Capital)
Formation)

To: The Commission

REPLY COMMENTS

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SUMMARY

Western Wireless provides high-quality wireless service in 153 markets with an average population density of only 11 people per square mile, the lowest population density in the industry. Even in these rural markets, consumers benefit from vigorous competition. Most of Western Wireless' markets have three or more wireless competitors, in addition to wireline carriers with whom Western Wireless competes, as well.

Western Wireless provides innovative products and features at attractive prices to compete for customers in rural areas. It uses multiple technologies — analog and three varieties of digital — simultaneously in a market, in order to serve roaming customers regardless of the technology in their handsets, and offers inexpensive bundles of airtime. Consumers have benefited from the Commission's pro-competitive, deregulatory policies that have allowed Western to respond to their needs. The Commission should not abandon this deregulatory approach. Greater regulation of rural wireless service would inhibit, not stimulate, competition.

Western Wireless urges the Commission to make rural service more economically attractive to provide. Accordingly, the Commission should revise the USF program to eliminate inefficiencies and promote level competition between ETCs and incumbents; repeal the cellular cross-ownership restriction; streamline the cellular unserved area rules; permit use of a "substantial service" standard for performance; facilitate infrastructure sharing; reject mandatory easements and underlays; and consider increasing power limits.

Universal Service. The best way to stimulate rural deployment of telecommunications service is to reduce the cost of providing service. The universal service funding mechanism should make support available to wireless providers in high-cost areas. Universal service support has been instrumental to the ability of Western Wireless to serve rural consumers in its role as an ETC in 14 states and the Pine Ridge Indian reservation. Competition benefits rural consumers, making service available for the first time to some, and providing others with new services and better pricing. The key components of a competitive universal service system are: portability, an efficient funding mechanism, funding caps, support for multiple lines, and reasonable criteria for ETC designation. In addition, the Commission should seek to level competition between incumbents and competitive providers by working with the USDA to end incumbent protections in funding, and by eliminating rate-of-return regulation for rural telephone companies.

Cellular Cross-Interest Rule. The Commission should eliminate its rule that bars ownership of more than a 5% interest in a second cellular provider in any given rural service area. The rule is unnecessary, because effective competition exists in rural markets, and elimination of the rule could stimulate investment in rural service.

Unserved Area Cellular Rules. The Commission should adopt policies that facilitate rural service deployment by reducing cost and increasing carriers' flexibility. In particular, the "unserved area" rules for cellular service should be streamlined, because this will enable rural cellular service providers to expand their networks quickly and cost-effectively. The current rules discourage service improvements because of the time-consuming, costly application process involved if any new territory is served. Western Wireless supports Dobson's proposal to

permit small service area expansions on a secondary basis, and also urges allowing such service expansions on a primary basis with only a minor modification application.

Substantial Service Benchmark. Western Wireless supports the adoption of an optional benchmark for “substantial service.” This could motivate carriers to build out their footprints in less-populated rural areas. A meaningful safe harbor provision, including a population component, is essential, because of the physical size of rural counties.

Impediments to Infrastructure Sharing. The Commission should take a more active role in removing state and local barriers to infrastructure sharing. It should facilitate adoption of clear and consistent local siting standards. This would minimize the arbitrariness of local decisionmaking, which deters infrastructure sharing.

Power Limits. The Commission should not increase power limits at this time. Further study is needed about the interference potential, and increased power may produce only marginal improvements in service, if there is any improvement at all.

Let the Secondary Markets Policy Work Before Imposing New Costs and Requirements on Carriers. The Commission has just decided to permit a secondary market in spectrum usage to develop. If underlays or easements are both feasible and economically practicable, they should develop under the spectrum leasing paradigm without FCC involvement. The Commission should rely on the market to determine whether wireless spectrum can support alternative underlaid uses. Western also opposes rural spectrum audits, which would be a waste of administrative resources. Flexible service regulations and market forces will promote the use of underutilized spectrum.

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| 2000 Biennial Regulatory Review Spectrum Aggregation Limits For Commercial Mobile Radio Services |) | WT Docket No. 01-14 |
| |) | |
| Increasing Flexibility to Promote Access to and the Efficient and Intensive Use of Spectrum and the Widespread Deployment of Wireless Services, and to Facilitate Capital Formation |) | WT Docket No. 03-202 |
| To: The Commission | | |

REPLY COMMENTS

Western Wireless Corporation (“Western Wireless”) hereby submits its reply comments in response to the Commission’s October 6, 2003 *Notice of Proposed Rulemaking* in the above-captioned proceeding.¹ Western Wireless is one of the largest rural telecommunications providers in the United States with a state-of-the-art wireless network serving the communications needs of rural consumers and businesses in 19 states. Through its radio licenses, Western Wireless provides services such as cellular telephone service, Personal Communications Service (“PCS”), wireless local loop service, universal service, and high-speed

¹ *Facilitating the Provision of Spectrum-Based Services to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum-Based Services*, WT Docket No. 02-381, *Notice of Proposed Rulemaking*, 18 FCC Rcd. 20802 (2003) (hereinafter “NPRM”).

data and Internet services. In these Reply Comments, Western Wireless explains how the Commission's rules can be revised to better serve the public interest.

INTRODUCTION

Western Wireless provides high-quality Commercial Mobile Radio Service ("CMRS") in 153 cellular and PCS markets west of the Mississippi River. These markets cover approximately 30 percent of the continental United States, and have an average population density of only 11 people per square mile (7 if Western's MSAs are omitted) – the lowest population density in the industry.²

Even in the rural markets where Western Wireless offers service, consumers are benefiting from fierce competition. Western Wireless competes with almost 40 different providers in the various markets that it serves, with most of Western Wireless' markets having three or more facilities-based competitors.³ These competitors range from the six "national" wireless carriers,⁴ to various regional and local providers striving to serve niche markets.

Western Wireless provides high-quality service and innovative products and features, and competes with both wireless and wireline carriers. Western Wireless uses a multi-technology approach to serving the varying needs of roaming customers, deploying AMPS, TDMA, CDMA, and GSM technologies simultaneously in a given market to ensure that Western is positioned to provide service to roaming customers regardless of the technology in their handsets. As just one

² "Western Stakes Its Claim in Wireless Frontier," *Wireless Week*, Sue Marek (March 12, 2001).

³ *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Eighth Report*, WT Docket No. 02-379, 18 FCC Rcd. 14783, 14823 (2003).

⁴ AT&T Wireless Services, Inc. ("AWS"), Cingular Wireless LLC ("Cingular"), Nextel Partners, Inc. ("Nextel"), Sprint Spectrum, L.P. ("Sprint PCS"), T-Mobile USA ("T-Mobile"), Verizon Wireless ("VZW").

example of Western Wireless' competitive service offerings, customers in rural areas of Texas and New Mexico can receive 1,000 "anytime" minutes, plus unlimited nights and weekends, and 1,000 mobile-to-mobile minutes for just \$40 per month. Clearly, rural consumers are reaping the benefits of the Commission's pro-competitive, deregulatory policies that have allowed Western Wireless to leverage its radio licenses to fully serve the telecommunications needs of consumers.

Given the demonstrable success of the Commission's current deregulatory policies in stimulating competition in rural America, Western Wireless agrees with several commenters that the Commission should not abandon its de-regulatory approach to the wireless industry.⁵ Greater regulation of a competitive industry has a chilling effect on innovation and would *inhibit, not stimulate*, rural buildout by imposing additional costs on carriers, which, in turn, would undermine existing business plans and restrict access to capital.

Western Wireless agrees with Nextel that the Commission should promote rural deployment by "modify[ing] the economics of the market entry to make it in the carrier's interest to provide service" in rural markets.⁶ Western Wireless also supports the following Commission actions to reduce the costs of rural deployment and increase flexibility for rural wireless carriers:

- Revise the Universal Service Fund ("USF") program so long-standing funding inefficiencies are eliminated and ensure that competitive Eligible Telecommunications Carriers ("ETCs") compete on a level playing field with incumbents;
- Repeal the cellular cross-ownership restriction;

⁵ See AWS Comments at 10; Cingular Comments at 3-5; Dobson Communications Corp. ("Dobson") Comments at 9-10. The Commission is contemplating a number of policy changes that would depart dramatically from its highly successful, market-oriented, deregulatory approach to wireless service, including: the grant of "easements" or "underlays" that would permit unlicensed use of licensed spectrum within the licensed carrier's exclusive service area; the imposition of additional buildout or coverage requirements at renewal; and adoption of more stringent performance requirements.

⁶ Nextel Comments at 18.

- Streamline the cellular unserved area rules to allow licensees to extend into unserved areas of less than 50 square miles;
- Allow licensees to satisfy the Commission’s performance requirements using a “substantial service” standard;
- Facilitate infrastructure sharing;
- Reject use of mandatory easements and underlays; and
- Explore increased power limits.

These changes, coupled with the changes recently adopted by the Commission in the *Secondary Markets* proceeding,⁷ will continue to stimulate wireless deployment in rural areas.

I. WIRELESS CARRIERS PLAY A VITAL ROLE IN PRESERVING AND ADVANCING UNIVERSAL SERVICE, ESPECIALLY GIVEN CONSUMERS INCREASING RELIANCE ON WIRELESS SERVICE TO MEET THEIR TELECOMMUNICATIONS NEEDS

As the Commission has recognized, there are “inherent economic challenges of providing telecommunications services in sparsely-populated, expansive rural areas.”⁸ Although rural carriers must expend significant amounts of money to construct and operate wireless systems covering huge geographic areas, the small populations that they serve limit the return on investment. Thus, the best way for the Commission to stimulate rural deployment is to reduce the associated costs of providing service.⁹ A competitive universal service funding mechanism accomplishes this objective by making support available to wireless carriers that serve high-cost areas. In response to any Federal-State Universal Service Joint Board recommendation on universal service reform, the Commission should revise its rules with an eye towards advancing

⁷ *Promoting Efficient Use of Spectrum through Elimination of Barriers to the Development of Secondary Markets*, WT Docket 00-230.

⁸ *NPRM* at ¶ 4.

⁹ *See, e.g.*, Dobson Comments at 7; AWS Comments at 10; Nextel Comments at 5.

the nation's universal service goal of providing rural consumers with access to service "reasonably comparable to those services provided in urban areas."¹⁰

Western Wireless has been designated as an ETC in 14 states plus the Pine Ridge Indian reservation. Universal service support has been instrumental in Western Wireless' ability to expand and enhance its network to serve rural consumers residing in high-cost areas. The Commission has implemented a competitive universal service system, recognizing that rural consumers will benefit from competition. Competition preserves and advances universal service by making service available in previously unserved or underserved areas (*e.g.*, the Pine Ridge Indian reservation) and by providing consumers with new services, access to technological and service innovations, and better pricing and customer service (*e.g.*, areas where wireless carriers compete with wireline carriers). The key components of a competitive universal service system include:

- **Portability** — the marketplace should determine the services and service providers that best meet the needs of consumers and allow carriers to receive support on a per-line basis for the customers served;
- **Efficient Funding Mechanism** — portable universal service support should be available based upon a forward-looking, least-cost technology approach to determining support levels;
- **Funding Caps** — caps should be imposed to limit the growth of the universal service fund, with appropriate safety net funding mechanisms to ensure sufficient support for efficient carriers providing universal service in a high-cost market;
- **Support For All Lines, Not Just Primary Lines** — limiting support in rural areas to only primary lines would retard universal service and create a "telephone divide" between rural and urban consumers; and
- **Reasonable Criteria or Conditions for ETC Designations** — competitive ETCs should only be subject to those criteria or conditions necessary to preserve and advance universal service, and should not be

¹⁰ 47 U.S.C. § 254(b)(3).

subject to regulations aimed at controlling the practices of incumbent (dominant or monopoly) local exchange carriers.

Additionally, the Commission should take other steps to ensure a level playing field between incumbent local exchange carriers and competitive providers, such as:

- Eliminate incumbency protections in the Rural Utilities Service (“RUS”) program. The U.S. Department of Agriculture (“USDA”) restricts competition with existing RUS telecommunications borrowers,¹¹ which perpetuates an outdated Depression-era policy to fund only a single carrier in each geographic area. This misguided rule makes it impossible for competition to develop on a level playing field in rural areas, thereby depriving rural consumers of access to competitive alternatives and hurting economic development in rural America. The Commission should work with the USDA to eliminate this restriction.¹²
- Eliminate rate-of-return regulation of the rural LECs. On October 30, 2003, Western Wireless filed a Petition for Rulemaking Regarding the Elimination of Rate-of-Return Regulation.¹³ This Petition calls for the elimination of the monopoly-inspired rate-of-return regulation of incumbent LECs in the long term, and in the short-term proposes that certain safeguards for rate-of-return carriers be adopted, including: periodic independent audits to verify proper classification and reporting of loop counts and network investments, compliance with cost accounting manuals and control, compliance with affiliate transaction rules, and proper booking of costs and recording of interest expenses.

II. THE CELLULAR CROSS-INTEREST RULE IN RSAS SHOULD BE ELIMINATED

The cellular cross-interest restriction, contained in Section 22.942 of the Commission’s rules, prohibits an entity with an attributable interest in a cellular Rural Service Area (“RSA”) license from holding more than a five percent interest in the other cellular license for that RSA.¹⁴

¹¹ See *Department of Agriculture, Rural Utilities Service, Rural Broadband Access Loans and Loan Guarantees*, 68 Fed. Reg. 4684, 4686 (Jan. 30, 2003).

¹² See Cellular Telecommunications & Internet Association (“CTIA”) Comments at 13-15; Nextel Comments at 9-10.

¹³ Western Wireless Corp. Petition for Rulemaking Regarding the Elimination of Rate-of-Return Regulation, CC Docket No. 96-45, RM No. 10822 (filed Oct. 30, 2003), at 30-31.

¹⁴ 47 C.F.R. § 22.942; *NPRM* at ¶ 91.

In light of the Commission's determination that effective competition exists in rural markets,¹⁵ this rule is no longer necessary and inhibits the natural functioning of the free market. Its elimination, as noted in the *NPRM*, could stimulate financing to, and investment in, rural areas.¹⁶ Thus, Western Wireless agrees with the many commenters who advocate repeal of this restriction.¹⁷

III. THE COMMISSION SHOULD ADOPT POLICIES THAT REDUCE THE COST OF RURAL DEPLOYMENT AND INCREASE FLEXIBILITY FOR RURAL WIRELESS CARRIERS

A. The Cellular Unserved Area Rules Should Be Streamlined

In the *Part 22 Biennial Review* proceeding,¹⁸ several carriers, including Western Wireless, recommended modifications to streamline the cellular unserved area rules.¹⁹ Implementation of these recommendations would do much to facilitate service to rural areas. Although the Commission has indicated that it will consider these recommendations as part of

¹⁵ *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*, WT Docket No. 02-379, *Eighth Report*, FCC 03-150 at ¶ 13 (July 14, 2003).

¹⁶ *NPRM* at ¶ 90.

¹⁷ See Rural Telecommunications Group/OPASTCO Comments at 14; CTIA Comments at 12-13; Dobson Comments at 10-13; AWS Comments at 9; Cingular Comments at 5-6.

¹⁸ *Year 2000 Biennial Regulatory Review – Amendment to Part 22 of the Commission's Rules to Modify or Eliminate Outdated Rules Affecting the Cellular Radiotelephone Service and other Commercial Mobile Radio Services*, WT Docket No. 01-108, *Notice of Proposed Rulemaking*, 16 FCC Rcd. 11169 (2001) ("Part 22 Biennial Review"); see also *Petition for Limited Reconsideration of Dobson Communications Corporation*, WT Docket No. 01-108 (filed Jan. 16, 2003) ("Petition for Reconsideration").

¹⁹ See Cingular Part 22 Biennial Review Comments, WT Docket No. 01-108, at 24-25 (July 2, 2001); AWS Part 22 Biennial Review Reply Comments, WT Docket No. 01-108, at 3 (filed Aug. 1, 2001); Western Petition for Reconsideration Comments, WT Docket No. 01-108, at 9 (filed April 1, 2003); *Petition for Reconsideration* at 3.

the reconsideration of the *Part 22 Biennial Review Order*,²⁰ it is important that the Commission recognize that revising the cellular unserved area rule will enable rural cellular service providers to expand their networks in an expeditious and cost-effective manner to the benefit of rural consumers. The current unserved area process is unwieldy and inhibits rapid deployment of wireless service to the most rural areas of Western Wireless' markets. For example, prior to sectorizing a rural cell on the periphery of its CGSA, Western Wireless must engineer the cell to ensure that it does not encroach into the slightest amount of unserved area, or file a time-consuming and costly major modification application. Clearly, this process discourages licensees from making engineering changes to improve coverage in rural areas. Similarly, prior to providing service to a new residential area at the periphery of its existing service area, Western Wireless must file and await grant of a major modification application.

In the hope of remedying this burdensome process, Dobson has proposed that the Commission allow licensees to extend into unserved areas of less than 50 square miles on a secondary, non-interfering basis to any licensee that might be authorized to cover the area in the future.²¹ Western Wireless supported this recommendation, and offered an additional variation: permit carriers to serve these areas on a primary basis through filing a minor modification notification.²² Any extension beyond the initial 50 square miles would necessarily require a Phase II unserved area application.²³ Western Wireless' proposal has the benefit of promoting

²⁰ *NPRM* at ¶ 27.

²¹ *See* Dobson's Part 22 Biennial Review Comments, WT Docket No. 01-108, at 2-3 (July 2, 2001).

²² Western Wireless Comments to Petition for Reconsideration at 11.

²³ The FCC could, for example, adopt a rule similar to section 1.929(d)(x) of its rules, which states: "Any change which together with all minor modifications or amendments since the last major modification or amendment produces a cumulative effect exceeding any of the []major criteria [is a major modification]." *See* 47 C.F.R. § 1.929(d)(x).

regulatory certainty while at the same time providing a streamlined mechanism for carriers to make limited engineering modifications and fill in small, unserved pockets.

As noted by Dobson, there was broad support for changing the unserved area rules, and no opposition.²⁴ Accordingly, the Commission should employ its Section 11 authority by removing the presently burdensome and unnecessary unserved area process that is inhibiting cellular carriers from expanding rural coverage.²⁵

B. The Commission Should Adopt Performance Requirements Using a “Substantial Service” Standard

Western Wireless supports the Commission’s proposal to adopt an optional “substantial service” construction benchmark, while retaining the current population benchmark for geographic licensees.²⁶ The Commission recognizes that many geographic area licensees are hamstrung by current construction benchmarks, which tend to lead carriers to concentrate their buildout around population centers.²⁷ As the Commission noted in the *NPRM*, “applying an inflexible construction standard that is based upon coverage of a requisite percentage of an area’s population may be an inappropriate measure of levels of rural construction.”²⁸ For these reasons, Western Wireless agrees that a substantial service option could go far to motivate carriers to build out their footprints in less populated areas.

For any substantial service benchmark, it is important that the Commission include a meaningful rural safe harbor provision.²⁹ Western Wireless agrees with Dobson, who noted that the Commission’s proposed safe harbor provision will not be effective unless it includes a

²⁴ See Petition for Reconsideration at 3.

²⁵ 47 U.S.C. § 161.

²⁶ *NPRM* at ¶ 35

²⁷ *Id.*

²⁸ *Id.*

population component.³⁰ Understandably, the Commission wants to formulate an alternative to the current construction benchmark — one that is not as focused on showings based on population criteria. But rural counties are typically much larger than their urban counterparts.³¹ Thus, the rural carrier, when presented with the challenge of substantially serving its market and falling within the proposed safe harbor guidelines (buildout to at least 75% of the geographic area of at least 20 counties within its licensed area), it may well be easier to meet the traditional population-based benchmark.³² Accordingly, Western Wireless supports the recommendation that the Commission adopt a safe harbor provision that incorporates a population component.³³

C. The Commission Should Remove Regulatory Impediments to Promote Infrastructure Sharing

Recent developments in infrastructure sharing are helping to reduce overall construction costs and diversify service options in rural markets. The *NPRM* highlights several joint ventures where carriers successfully shared their existing networks.³⁴ To further promote infrastructure sharing, Western Wireless agrees that the Commission needs to take a more active role in removing state and local barriers that are impeding infrastructure sharing.³⁵ As one commenter noted, the Commission “would do much to advance rural wireless build out by taking active steps to facilitate adoption of clear and consistently-applied siting standards by local governments.”³⁶

²⁹ See Dobson Comments at 15-16.

³⁰ *Id.* at 16.

³¹ *Id.*

³² *NPRM* at ¶ 41.

³³ Dobson Comments at 15-16.

³⁴ *NPRM* at ¶ 101.

³⁵ See CTIA Comments at 15-16; Dobson Comments at 13.

³⁶ Dobson Comments at 13.

Embedded within the current regulatory landscape is a “patchwork” of state and local zoning regulations that can cause significant delays in buildout.³⁷ Similar to the experiences highlighted by other commenters, Western Wireless has found that local proceedings are often plagued by arbitrary decision-making.³⁸ Moreover, it is not uncommon for local officials to impose heavy restrictions on right-of-way access as a condition for approval.³⁹ Having to navigate this regulatory morass makes infrastructure sharing challenging. For these reasons, Western Wireless joins those commenters who request that the Commission work with the wireless industry to formulate a coherent national policy that will encourage state and local governments to apply reasonable and consistent standards in evaluating tower construction requests.⁴⁰

D. The FCC Should Not Allow Increased Power Limitations at This Time

The Commission and CTIA have raised legitimate concerns related to increased power limits and interference.⁴¹ Increasing power levels for unlicensed devices and Part 101 microwave services could lead to unacceptable levels of interference to neighboring systems.⁴² Similarly, increasing power levels at cellular base stations could cause interference while yielding only marginal improvements in coverage.⁴³ In addition, it might not be technically feasible to improve coverage at all by increasing power levels at cellular base stations —

³⁷

Id.

³⁸

Id.

³⁹

CTIA Comments at 16.

⁴⁰

Id.; Dobson Comments at 13.

⁴¹

NPRM at ¶ 52; CTIA Comments at 10.

⁴²

Id. at ¶¶ 54; 49.

⁴³

Id. at ¶ 53.

especially in remote rural areas — given the relatively weak signal of cellular handsets.⁴⁴ Increased base station power would not result in more geographically extensive coverage if the mobile unit's signal is the range-limiting factor. The Commission should conduct meaningful engineering studies prior to pursuing this option.

IV. THE COMMISSION SHOULD REFRAIN FROM IMPOSING ADDITIONAL REQUIREMENTS AND COSTS ON CARRIERS BEFORE SECONDARY MARKETS HAVE HAD A CHANCE TO DEVELOP

Western Wireless joins several commenters in opposing the use of mandatory easements or underlays as a means of facilitating investment in rural areas.⁴⁵ Such measures are counterproductive and would insert uncertainty for those licensees who purchased spectrum at auction. Given the robust state of competition in rural markets, the Commission should instead look to secondary market spectrum leasing as the primary means of encouraging access to underutilized spectrum. To this end, the Commission should refrain from imposing mandatory easements until it has ample opportunity to evaluate new secondary leasing arrangements.⁴⁶

Similarly, Western Wireless opposes the use of rural spectrum audits.⁴⁷ Western Wireless firmly believes that such audits are not necessary and would be a waste of administrative resources.⁴⁸ Flexible service regulations and market forces will promote the use of underutilized spectrum. Spectrum audits will only serve to undermine planned growth and expend Commission resources in areas where scarcity of spectrum is not at issue.

⁴⁴ *Id.* at ¶ 52.

⁴⁵ *NPRM* at ¶ 30; Dobson Comments at 10; Nextel Comments at 5; Cingular Comments at 5; AWS Comments at 8; CTIA Comments at 8.

⁴⁶ *See e.g.*, AWS Comments at 8; CTIA Comments at 8.

⁴⁷ *NPRM* at ¶ 23.

⁴⁸ *See* CTIA Comments at 7.

CONCLUSION

As detailed in these comments, the Commission's current deregulatory policies have been successful in stimulating competition in rural America – all to the consumer's benefit. The Commission should not reverse course and mandate uneconomic and counterproductive requirements that would impose additional costs and discourage development in rural markets.

Respectfully submitted,

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