FCC Mobility Fund Phase II Challenge Process, Condensed Notes
FCC presentation at NH PUC, May 22, 2018
(Thank you to Justin Roshak)

The FCC has made some $4.53 billion available nationwide to incentivize 4G LTE coverage in areas where no un-subsidized coverage exists. The existing map of eligible areas is quite restricted, and is based on provider-supplied remote tests.

Companies will bid for the money through a 'reverse auction'. Effectively, each interested carrier will bid on how much money it would take them to provide service in a particular area, with the lowest bid winning their requested funds. This will be a national auction.

Available funds will be $4.53 billion over 10 years, or about $453 million per year, for the entire United States, excluding Alaska. The first auction is planned for sometime in 2019, with no firm date at present.

A successful bid will commit the winning carrier to a ten-year process, including construction benchmarks and other progress metrics. After ten years, carriers could pull out of an area. It is entirely possible that certain areas won't be bid on.

Several attendees from comparable communities said that the existing coverage and eligibility map is insufficient, and does not reflect existing gaps in service. Tuesday's meeting laid out the process for challenging the map of areas on which providers might bid to provide 4G LTE coverage.

In summary, the challenge process looks like this:

1. Request access to the USAC Challenge Portal via the request form. Anyone affiliated with a state, local, or tribal entity can request access on behalf of that entity. Each town can have up to three registered users.

2. Log into the USAC Challenge Portal and download the confidential, provider-specific coverage data.

3. Analyze the provider-specific coverage data and determine where to challenge.

4. Conduct speed test measurements in these areas. Tests may be conducted using free FCC Speed Test app (iOS/Android), using provider-supplied devices. This can include personal cell phones, as long as the provider matches.

5. The data must be verified by a qualified engineer, or government official. There's some gray area about who counts as a government official for the purposes of verifying, but a town administrator or police officer certainly would.

The challenge window is open for 150 days, or until August 27th.

The only areas that are eligible are those in which there is no unsubsidized 4G LTE coverage. Areas with a single provider only qualify if the coverage is NOT subsidized.

On the current eligibility map, green areas are currently ineligible, but only possess a single, subsidized

carrier providing 4G LTE coverage. Blue areas are already eligible (but comprise a very small fraction).

To quote an FCC rep: “The areas which are ineligible have a carrier offering un-subsidized 4G LTE service.”

Coverage areas are broken into 1-km squares. A challenge has to cover 75% of each square to qualify. Each speed test has a radius of about 400 meters, so about **three tests per grid** would be sufficient. The speed test app saves and uploads the data automatically. In areas without sufficient roads, off-roads tests on foot would be required.

Not everyone can “verify” a speed test. Or, not everyone counts for the purposes of conducting speed tests. The rules for who count are obscure: police and town officials certainly count, but citizen volunteers are a grey area, according to the FCC rep. It does not appear that appropriate consideration has been given to the limited resources of rural communities.

One attendee suggested enlisting first responders, especially police, who might already do runs along roads. The challenge would be coordinating sweeps for sufficient tests per km square.

Many attendees expressed interest in mobilizing some form of regional effort to pool resources and reduce costs.