

**STATEMENT OF
COMMISSIONER MEREDITH ATTWELL BAKER**

Re: In the Matter of Universal Service Reform, Mobility Fund, Notice of Proposed Rulemaking, *WT Docket No. 10-208*.

I appreciate this item's focus on the wireless-specific challenges related to universal service and mobile broadband deployment. While I do have some reservations about the specifics and timing of the Mobility Fund as proposed, I support the underlying objective to adopt policies to promote more widespread deployment of basic wireless and mobile broadband solutions.

As a threshold matter, I want to make sure that we do not lose sight of the need for comprehensive reform of Universal Service. I believe that it is critical to move toward fundamental reform of the Universal Service Fund, targeted to broadband investment. We need to transition to a support mechanism that is effective, efficient, and sustainable for areas where market forces are not sufficient to drive broadband services to America's consumers. I would not want to let our work on the Mobility Fund in any way detract from our collective focus on the difficult business of comprehensive, cost-effective reform. Similarly, I have concerns with any additional outlay of universal service funds. We must make sure that we are using USF funds as prudently as possible to ensure that we get the greatest benefit for the public's money.

With respect to the Mobility Fund itself, I note that the Fund would be created through a one-time payment. Operationally, I have a concern as to whether a one-time support mechanism will prove sustainable to provide mobile broadband services in unserved areas, or whether this effort will lead to a future further drain on resources to maintain the expanded infrastructure.

Lastly, I am hopeful that this proceeding is not our only opportunity to address policies to promote greater deployment of basic wireless and mobile broadband services to rural and underserved communities. Upgrading service from 2G to 3G "or better" service in one county may well be worthwhile, but it does not address the challenge facing those counties that have no wireless service at all today. There are few more needy—or visible—consumers than those who live in the unserved areas on mobile providers' maps. In the coming months, I am optimistic we can consider additional measures, including but not limited to, expanded use of appropriately regulated signal boosters and consumer installed femtocells, to expand our nation's wireless footprint in a cost-effective manner deeper into rural America.

I would like to thank the staff for their work on this item, and look forward to working closely with the Chairman and my fellow Commissioners on universal service reform measures.