

**Congress of the United States**  
**Washington, DC 20515**

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September 7, 2018

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Chairman Pai:

We write today in regards to the Federal Communications Commission's (FCC or Commission) Mobility Fund Phase II (MF-II) Challenge Process.

As you are very aware, the funds in the Commission's MF-II will support providers of wireless and broadband services in rural areas in a very significant way. By ensuring those in rural areas can interact with and access the full suite of innovative technologies in today's information age, MF-II stands to increase quality of life for many rural Americans, including in our state of Oklahoma.

To that end, it is important that that any funding allocation decisions are based on accurate data. We have heard concerns from several rural providers in Oklahoma, specifically those providing wireless mobile coverage, that the Commission's request of companies fails to ensure sufficiently accurate maps can be produced to guide the Mobility Fund auction. Challenging those coverage maps is extremely costly for rural carriers, many of whom already operate on tight margins and slim budgets to provide basic services to their subscribers. For instance, prospective challengers must complete time-consuming speed tests to verify the claims by other carriers. Considering the stakes for Oklahomans and other rural residents nationwide, we therefore urge the Commission to critically examine all submissions from all carriers for accuracy and consistency. Areas that are incorrectly deemed as "served" will not receive Universal Service Fund assistance for perhaps a decade, which would adversely affect economic development and general quality of life in rural America.

It is similarly important that the Commission allow adequate time for the evaluation of any challenges to the submissions of other carriers. We appreciate the Commission's approval of a recent Order extending the Challenge Process window by 90 days, as that extension will certainly help this process. But given the cost and labor associated with these challenges, we hope the Commission will work accommodatingly with carriers toward meeting the submission deadline in a timely fashion.

As your office has stated, the MF-II auction will award \$4.53 billion in support over ten years and "it's critical that we get it right."<sup>[1]</sup> You have also rightly stated that "[o]ur limited universal service funds for mobile service must be effectively and accurately targeted to areas that lack

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<sup>[1]</sup> Press Release, Chairman Pai Statement on Circulation of Order to Extend Mobility Fund Phase II Challenge Process (August 3, 2018).

unsubsidized 4G LTE service.”<sup>[2]</sup> As such, we hope the Commission will consider our recommendations and act appropriately on them.

Sincerely,



James M. Inhofe  
United States Senator



James Lankford  
United States Senator



Frank D. Lucas  
United States Representative



Tom Cole  
United States Representative



Markwayne Mullin  
United States Representative



Steve Russell  
United States Representative

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<sup>[2]</sup> *Id.*