

United States Senate

WASHINGTON, DC 20510

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January 10, 2019

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

Received & Inspected

JAN 16 2019

FCC Mailroom

Dear Chairman Pai,

We write today to ask you to review the enclosed letter, which was sent to our offices by stakeholders in the Monadnock Region of New Hampshire. We are concerned about the issues raised by these important community organizations regarding the Mobility Fund II (MFII) Challenge Process.

In the attached letter, the leaders from the Monadnock Region detail the significant time, energy and resources expended by local stakeholders to provide the required information to the FCC regarding MFII eligibility. Here in New Hampshire, many of our small towns do not have extensive resources to conduct the activities necessitated by the Challenge Process. Many of these towns are also rural communities covering large areas that require labor-intensive efforts in order to confirm the accuracy of the FCC's MFII maps.

We are pleased that the FCC has recently taken steps to further extend the timeline of the MFII Challenge Process, and appreciate the efforts made by FCC staff to work with our New Hampshire offices to offer technical assistance to our local communities. However, we share these communities' concerns that this Challenge Process has placed a significant burden on New Hampshire municipalities. Furthermore, we understand the frustration these stakeholders express at the claims of coverage made by some cellular providers. The data obtained by these stakeholders, at a significant cost in both time and money, suggests that those claims may be inaccurate. The FCC's process for challenging these maps has placed the onus on resource-strapped localities to disprove overstated claims.

We urge the FCC to seriously consider the concerns of the enclosed. In addition, we urge the FCC to learn from the issues resulting from the MFII process so that we can better deploy taxpayer resources in the future. Broadband and wireless communication access are vital to the economic development of rural communities in New Hampshire and across the country. We must put our communities in a position to succeed when we build and execute these federal programs.

Thank you for your attention to this request.

Sincerely,



Jeanne Shaheen
United States Senator



Margaret Wood Hassan
United States Senator



Ann McLane Kuster
Member of Congress



Chris Pappas
Member of Congress



County of
Cheshire, New Hampshire



November 21, 2018

SUBJECT: FCC MF-II Challenge

New Hampshire's Federal Delegation, Public Utilities Commission, Interested Parties:

In many parts of Southwest New Hampshire, lower quality telecommunications service including 4G LTE becomes a limiting variable to economic competitiveness and quality of life. Based on what many of our communities felt were inaccurate coverage maps submitted to the FCC by providers, several municipalities in Cheshire County and the Monadnock Region have expressed interest in the Federal Communication Commission's MF-II Challenge. Staff from the New Hampshire Public Utilities Commission (PUC) have provided leadership in coordinating data collection activities and technical assistance to several municipalities in their efforts as part of the Challenge process.

The Challenge process itself creates a significant burden on municipalities and requires capital - financial, technical and volunteer - which is a lot to expect in a predominantly rural area. Despite the efforts of the PUC and citizen volunteers, we have not achieved full coverage of data testing throughout the Region, and the FCC's submission deadline is fast approaching.

Our organizations have stepped forward in providing resources to facilitate this process. Data collected to-date suggests the following:

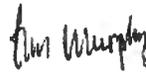
1. Service availability is overstated in many parts of Southwest New Hampshire. Of the more than 20,500 data points collected in Southwest NH through November 19th, nearly 84% reveal a download speed of less than 5Mb.
2. Although a complete dataset has not been achieved to "fill-in" the entire square kilometer grid system of the Region, or even failed blocks to the 75% level required, the data as mapped suggests the likelihood of overstated service in areas that volunteers were not able to verify.
3. Additional time would be needed to complete data collection activities to the specifications of the Challenge process. This would be the case even if towns had gotten an earlier start.

4. The Challenge process is excessive and unreasonable to expect of rural communities in terms of required capital and volunteers within the timeframe made available.
5. Service coverage maps submitted to the FCC by providers vary in degree of accuracy. This calls into question the integrity or methodology of those providers whose service availability is more commonly overstated. Our understanding of the field data collected in the challenge process indicates a passing grade for service availability as follows: AT&T 17.6%; Sprint 28%; T-Mobile 22.8%; Verizon 4.3% - yet Verizon claims the highest levels of service among the four providers.

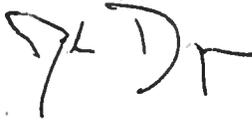
We cannot overstate the importance of access to quality telecommunications infrastructure to the economic competitiveness and quality of life in Southwest New Hampshire. Therefore, we appreciate whatever assistance our federal delegation, PUC and others are able to provide as we advocate for attention to this critical issue.



Chris Coates, Administrator
Cheshire County



Tim Murphy, Executive Director
Southwest Region Planning Commission



Jack Dugan, President
Monadnock Economic Development Corporation



Phil Suter, President & CEO
Greater Keene Chamber of Commerce