

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

Re: *Connect America Fund*, WC Docket No. 10-90; *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208

The Connect America Fund's Mobility Fund has had a checkered past for quite some time. Much of this was due to the lack of vision and attention paid by previous Commissions to implement needed reforms. That is why I was pleased when Chairman Pai took the necessary steps to substantially improve the program, particularly by targeting funds to only those areas without sufficient 4G wireless service and removing it from those with such service from multiple providers. At the outset of this effort, I pushed for a robust challenge process because of the lack of applicable and reliable data, which is used to populate our service maps. In order to get this right, I fully support extending the challenge process by three months, as contained in this item.

Make no mistake: our current 4G service maps are not perfect by any means and are rightfully criticized. This needs to improve significantly or Federal universal service fund monies will be wasted, thereby over-subsiding those that don't deserve it and penalizing those consumers in need. To do this, the Commission needs to work with all parties to find acceptable parameters for the challenge process. For many months, and continued in this item, we have tried to dictate a "solution" and release new maps that don't solve any of the controversies. For this reason, I thought it best that this document be made public prior to our vote so that stakeholders could have shared their views regarding the parameters of the speed test measurements, which are the subject of two applications for review denied in this item. While I will also support these portions of the item, I worry that today's action will neither be the end of the debate nor allow the Commission to quickly complete Mobility Fund Phase II.