

**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

Bringing mobile broadband to those Americans living in unserved areas of our country is a goal that I have long-championed in my role as a Commissioner. Our ability to target scarce Universal Service funds to those areas without 4G service, however, depends on the accuracy of our service coverage map in portraying the situation on the ground. The woeful inadequacy of our initial eligibility map has plagued the Mobility Fund Phase II (MF-II) proceeding, and, despite the Commission's adoption of a robust challenge process at my behest, the parameters governing the challenge process remain subject to significant controversy. As I warned in August 2018 when the Commission voted to extend the MF-II challenge process by three months, there remains a long and difficult road ahead in finalizing the map's coverage. By imposing Commission-designed solutions rather than working with interested parties to understand their problems and how to make the entire structure actually work, we certainly haven't helped the process.

Four months later, we are no closer to determining which unserved areas will be eligible for MF-II support. And, with the current investigation into a possible rule violation by one or more providers, the timeline has become even more indefinite. While I support this item's effort to harmonize the timeframe for the collection of speed test data with the extended challenge window, our underlying mapping problems remain and, as a result, most of this item seems untimely or moot. I am grateful that the Commission is finally recognizing the flaws with the map and the challenge process and remain committed to getting this proceeding right rather than hastily rushing into an MF-II auction based on flawed data. More should be expected when the Commission is planning to distribute ratepayer funds, especially when the sum totals over \$4.5 billion, as in this case.