

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL,  
APPROVING IN PART, DISSENTING IN PART**

Re: *Establishing a 5G Fund for Rural America*, GN Docket No. 20-32, WT Docket No. 10-208.

It was a year and a half ago that Corey Chase took to the roads of Vermont. He crisscrossed the state, driving on everything from the biggest highways to the smallest stretches of dirt and gravel. He didn't log 6,000 miles in a car to take in the Fall leaves. He was doing his job. That's because Corey Chase is a Vermont employee. He was charged with testing the availability of wireless service in every corner of the Green Mountain State. To do this he took more than 180,000 speed tests using six different devices with six different service plans and too many tanks of gas to count.

He set out on this quest because the state believed that the wireless maps at the Federal Communications Commission for what was then-called Mobility Fund II suggested there was a whole lot more service in the state than its residents recognized. So the agency told stakeholders to put in the work, do tests, and prove it. A lot of them did. Because Corey Chase was not alone. In fact, more than 20 million speed tests were submitted to the FCC in a nationwide effort to demonstrate serious flaws in the FCC's wireless maps.

This history matters. Because it wasn't that long ago.

Now fast forward to the present. The FCC has scrapped the effort to have stakeholders improve our wireless maps. It passed on the work of Corey Chase and so many others. Instead of using their work to fix our maps and get a clear picture of where deployment is and is not, the agency threw up its hands and canceled the whole Mobility Fund II effort.

In its place we have what we introduce today—the new 5G Fund. It sounds good. Because we still have places in this country where signals are scarce and wireless service is hard to find. But this do-over has serious flaws. We're not just ignoring all the problems with mapping that came before, we're at risk of making the same mistakes again.

Here's why.

First, this 5G Fund rulemaking presents a false choice. It suggests we can either provide funds for more wireless service fast or we can do it accurately. That's crazy. We need to do both. If we're going to spend billions in public funds on improving wireless service in rural America it's not too much to ask that we do it with speed *and* get it right.

Under what my colleagues call Option A, the FCC would commit \$8 billion over the next ten years without any new maps. This would lock up the bulk of our universal service funds for improving wireless service for a decade, without an honest accounting of where service is and is not. This is a mistake. Under Option B, the FCC says it will roll up its sleeves and do the work to make improvements to our maps and then distribute funds accordingly. But it says it can't possibly do this for at least three years. This too is a mistake. In fact, the entire framing here is wrong. We can do two things at once. We can work fast and base our efforts on facts.

Second, we need maps before money and data before deployment because that is just what Congress told us to do in the Broadband DATA Act, which was signed into law last month. It sets forth very specific requirements designed to improve the FCC's broadband maps for wired and wireless service. Then this data was supposed to inform the agency's distribution of universal service funds to expand the reach of service in rural America. But the proposed 5G Fund ignores this fact and twists our legal obligations. I'm not the only one who thinks so. Just this week Senators Manchin, Lankford, Tester, and Hyde-Smith wrote us with a simple plea that we do this in the right order because we "can never deliver on the promise of Universal Service without accurate broadband coverage maps."

Third and finally, today's effort fails to properly examine the lessons learned from Mobility Fund II. In fact, the FCC terminates the Mobility Fund II docket. But why? Is the agency covering up its past mistakes? For the record, these include having carriers file maps that bore too little relation to reality. They include running a costly challenge process that required Corey Chase to drive thousands of miles on Vermont roads. They include failing to hold anyone accountable after our staff found some of our largest carriers filed inaccurate mapping data with this agency. It seems that by doubling the money and wiping the slate clean, the FCC hopes that no one will take notice. That's not right.

Starting over may be a necessary course, but we should find a better way forward. We can learn from what came before. We can do the work required in the Broadband DATA Act to identify where funds should go. And we can do this with both speed and accuracy. Because if we do, we can honestly and accurately support the expansion of wireless service in rural communities nationwide—and that, after all, should be our goal.

So while I approve the idea behind this fund, I dissent in all other respects.