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## SUMMARY

The rural broadband strategy report required by the 2008 Farm Bill is a significant first step towards – and an important part of – the national broadband strategy mandated in the American Recovery and Reinvestment Act of 2009. Broadband is changing life for all Americans – and, indeed, for people all over the world. But broadband is just one element of the fundamental transformation in the way people use technology in their professional and personal lives. Equally important is the transformational impact of mobility, and with respect to these comments – mobile broadband. The Commission’s broadband planning efforts must not only consider mobile wireless broadband, but also should foster the unique benefits that it brings to consumers and businesses. The idea of a third pipe to the home has been overtaken by the consumers’ desires to have broadband to the person, wherever they are, whenever they want access. These benefits are, indeed, most pronounced in rural areas, where distances make mobility an essential element of family life, economic development, safety and public health. As Congress noted when it was adopting the Farm Bill, the Secretary of Agriculture should “consider the unique way of life in rural America and to be mindful that mobile broadband technologies are applicable to farmers, ranchers, and small rural business owners.”

Formulating a rural broadband plan entails forward-thinking new policies to spur deployment, but also the revision of existing policies to support the effort. These reform efforts should be incorporated into any broadband strategy. The Commission should eliminate current systemic incentives for inefficiency and regulatory arbitrage so that rural America can be served with efficient, cost-effective, advanced broadband technologies. Universal service and intercarrier compensation reform are central to this effort. In addition, the Commission should lower barriers to expanding service in rural America by including in the broadband plan the relief sought in CTIA’s *Tower Siting Shot Clock* petition.

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Rural Broadband Strategy ) GN Docket No. 09-29  
 )

To: The Commission

**COMMENTS OF CTIA—THE WIRELESS ASSOCIATION®**

CTIA—The Wireless Association® (“CTIA”) submits the following comments in response to the Commission’s Public Notice regarding the rural broadband strategy report required by the 2008 Farm Bill.<sup>1</sup> As discussed in more detail below, the Commission and the Secretary of Agriculture should develop a rural broadband strategy that recognizes the unique advantages for consumers of mobile wireless broadband, and ensures that rural consumers enjoy the benefits of mobile broadband services. The rural broadband strategy also must promote efficient investment in and deployment of broadband infrastructure.

Ultimately, the rural broadband strategy must be an important element of the larger national broadband plan that the Commission is charged with developing under the American Recovery and Reinvestment Act of 2009.<sup>2</sup> The national broadband plan should build on the foundation for sustainable broadband growth established in this record.

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<sup>1</sup> *Comment Date Established for Report on Rural Broadband Strategy*, Public Notice, GN Docket No. 09-29, DA 09-561 (rel. Mar. 10, 2009) (“Public Notice”), *citing* Pub. L. 110-246, 122 Stat. 1651 (Jun. 18, 2008) (“2008 Farm Bill”).

<sup>2</sup> Public Notice at 1, *citing* American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115 (2009 (“Recovery Act”).

## **I. INTRODUCTION**

The rural broadband strategy should ensure that rural American consumers enjoy the benefits of mobile broadband services. Broadband and mobility are transforming the ways that Americans live, work, and play – and nowhere is this more true than in rural areas. In formulating a rural broadband policy (and a broader national broadband plan), the Commission must bear in mind that mobility – mobile broadband – is just as much a part of this transformation as broadband itself. As discussed below, the Commission’s broadband plan should foster the unique benefits that mobile wireless broadband brings to consumers while promoting efficient investment in broadband infrastructure.

## **II. THE RURAL BROADBAND STRATEGY MUST CULTIVATE AND HARNESS THE UNIQUE BENEFITS THAT MOBILE WIRELESS BROADBAND BRINGS TO CONSUMERS**

Over the last decade, the technologies and marketplace of America’s communications sector have evolved in ways that demonstrate the high value American consumers now place on mobile voice and broadband services. In 1997, there were approximately 55 million wireless telephone subscribers.<sup>3</sup> By mid-2007, that number had risen almost five-fold, to more than 240 million.<sup>4</sup> And the number of wireless broadband subscribers is growing even more dramatically.

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<sup>3</sup> *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, Third Annual CMRS Competition Report*, 13 FCC Rcd 19746 app. B, at B-2 (1998).

<sup>4</sup> *See Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, WT Docket No. 07-71, *Twelfth Annual CMRS Competition Report*, WT Docket No. 07-71, 23 FCC Rcd 2241, 2246 ¶ 2, FCC 08-28 (rel. Feb. 4, 2008) (“*Twelfth Report*”) at 6. By year-end 2007, CTIA’s semi-annual survey had found wireless subscribership had risen to 255,395,599. Press Release, CTIA – The Wireless Association®, *CTIA - The Wireless Association® Announces New Wireless Industry Survey Results*, available at <http://www.ctia.org/media/press/body.cfm/prid/1747> (Apr. 1, 2008) available at

(continued on next page)

The Commission's data show that, since 2005, mobile wireless providers have been the fastest-growing providers of both high-speed lines (over 200 kbps in at least one direction) and advanced service lines (over 200 kbps in both directions), with subscriber counts for high-speed lines more than *doubling* and advanced service lines more than *tripling* from just one year earlier.<sup>5</sup> As of December 2007, mobile wireless providers served more than 15 million customers with advanced service lines – nearly 20 percent of all advanced services.<sup>6</sup> Data from the Pew Internet & American Life Project reveal that in December 2007, 58 percent of adults have used mobile devices for non-voice activities, and 41 percent of adults have logged onto the Internet wirelessly.<sup>7</sup> There is no doubt that these wireless growth trends will continue to transform America's communications networks as innovation and investment in mobile wireless broadband infrastructure continues.

In adopting the 2008 Farm Bill, Congress noted the particular benefits of mobile wireless broadband in rural areas:

The Managers expect the Secretary [of Agriculture] to consider the unique way of life in rural America and to be mindful that mobile broadband technologies are applicable to farmers, ranchers, and small rural business owners. Fixed broadband service will continue to be important in rural homes and offices, but mobile technologies also may have a role to play in expanding broadband access to rural residents.<sup>8</sup>

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<http://www.ctia.org/media/press/body.cfm/prid/1747> 1, 2008), tables and graphics appearing at [http://files.ctia.org/pdf/CTIA\\_Survey\\_Year\\_End\\_2007\\_Graphics.pdf](http://files.ctia.org/pdf/CTIA_Survey_Year_End_2007_Graphics.pdf).

<sup>5</sup> HIGH-SPEED SERVICES FOR INTERNET ACCESS: STATUS AS OF DECEMBER 31, 2007, *available at* [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-287962A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-287962A1.pdf), at tbls.1-2.

<sup>6</sup> *Id.* at tbl. 2.

<sup>7</sup> John Horrigan, Associate Director, Pew Internet & American Life Project, Data Memo, *Mobile Access to Data and Information 1* (March 2008), *available at* [http://www.pewinternet.org/pdfs/PIP\\_Mobile.Data.Access.pdf](http://www.pewinternet.org/pdfs/PIP_Mobile.Data.Access.pdf) (“Pew Study”) at 1.

<sup>8</sup> 2008 Farm Bill, Joint Explanatory Statement of the Committee of Conference at 151 (addressing revised requirements for Department of Agriculture Rural Development broadband loans).

Indeed, the growing popularity of mobile wireless services is easy to understand. Mobility brings with it a level of convenience unmatched by fixed-line communications, bringing broadband to the person and allowing people to reach out and be reached wherever they may be located at any given moment.

Mobile wireless broadband in particular is well-suited to serving areas with widely dispersed populations – both when they are at home and when they are on the road. More sparsely populated areas generally mean more time on the road, so the ability to stay connected to work, family, and emergency services is critical. From rural business to health care, public safety and security to education, a wide range of rural users are already reaping the varied benefits of mobile wireless broadband services. CTIA’s “Wonder of Wireless” webcasts have highlighted these through videos of rural Americans using mobile wireless broadband in unique ways, such as, the use of mobile applications on a Mississippi farm and rural healthcare providers in Idaho using mobile broadband to bring state-of the-art medicine to rural patients.<sup>9</sup> A comprehensive rural broadband strategy will bring these and other benefits from the increased range and low infrastructure costs of modern mobile wireless networks to rural Americans.

Like broadband more generally, the availability of mobile services is also recognized as a condition precedent for economic growth – particularly in rural areas. Recent studies confirm that the mobile phone is “a huge boon to an individual’s economic productivity and earning

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<sup>9</sup> See “Wonder of Wireless Webcast”, CTIA – The Wireless Association® *available at* [http://www.ctia.org/consumer\\_info/wow/index.cfm/2008/0/](http://www.ctia.org/consumer_info/wow/index.cfm/2008/0/) (last accessed Mar. 25, 2009).

power.”<sup>10</sup> Further, as House Subcommittee on Communication, Technology and the Internet Chairman Rick Boucher noted in his comments on the groundbreaking for a cell tower in a community in his rural Virginia district that previously lacked mobile coverage, “businesses seeking to expand often consider the availability of mobile communications services when choosing new business locations.”<sup>11</sup>

Wireless broadband access stands at a pivotal moment in its evolution, with fundamental innovation occurring at the network, device, and application levels. The technology that enables mobile wireless Internet access at speeds as fast as (or even faster than) current fixed-line platforms like DSL or cable modem are being deployed by wireless carriers.<sup>12</sup> At the same time, significant newly available blocks of spectrum are expected to be used to provide mobile wireless broadband access.<sup>13</sup>

As a result of the increased capabilities of new mobile Internet devices, a diverse new array of applications and services that are changing the way Americans think about and use wireless services have emerged along with application stores to more easily bring these innovations to consumers. The iTunes App Store and Android Market have already begun to

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<sup>10</sup> Nicholas P. Sullivan, New Millennium Research, *Cell Phones Provide Significant Economic Gains for Low-Income American Households: A Review of Literature and Data from Two New Surveys*, 5 Nicholas P. Sullivan (April 2008), available at [http://newmillenniumresearch.org/archive/Sullivan\\_Report\\_032608.pdf](http://newmillenniumresearch.org/archive/Sullivan_Report_032608.pdf) (“Sullivan”).

<sup>11</sup> Alltel Breaks Ground on Cell Tower to Serve Pound Residents, *Kingsport Times-News*, March 11, 2008, at 3B.

<sup>12</sup> See, e.g., Letter from Paul Garnett, CTIA, to Marlene Dortch, FCC, WC Docket Nos. 05-337, 05-271 and 04-36; CC Docket Nos. 96-45 and 02-33 (filed Feb. 20, 2007) attachment (“Regulatory Classification of Wireless Broadband Internet Access”) at 3 (chart showing wireless broadband speeds).

<sup>13</sup> See, e.g., *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, et al.*, WT Docket Nos. 06-150, et al., Second Report and Order, 22 FCC Rcd 15289 (2007) (“700 MHz Order”).

serve this consumer need, with thousands of applications currently available to consumers.<sup>14</sup> Other wireless operating platforms have announced plans to meet this need of consumers, as well, with Research in Motion and Palm each announcing plans to launch application stores for their respective operating systems.<sup>15</sup>

In sum, mobile wireless broadband brings unique benefits to consumers, and its ability to do so will only increase over time. All consumers will enjoy these opportunities – but they are particularly beneficial to rural consumers who may not have other ways of staying connected. For all these reasons, mobile wireless broadband must be a central element in the Commission’s rural broadband plan.

### **III. THE RURAL BROADBAND STRATEGY MUST PROMOTE EFFICIENT INVESTMENT IN AND DEPLOYMENT OF BROADBAND INFRASTRUCTURE**

Part of the task of developing a rural broadband plan is formulating new policies to encourage broadband deployment; equally important, however, is ensuring that existing rules and policies do not impede deployment and, in fact, promote the efficient deployment of broadband infrastructure.<sup>16</sup> To this end, the rural broadband strategy should include the elimination of existing policies and rules that create incentives for inefficiency and arbitrage and

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<sup>14</sup> See e.g. “Apple – iPhone – App Store and Applications for iPhone”, <http://www.apple.com/iphone/appstore/> (last accessed Mar. 25, 2009); see also “Android | Market”, <http://www.android.com/market/> (last accessed Mar. 25, 2009).

<sup>15</sup> See “Blackberry App World”, <http://na.blackberry.com/eng/services/appworld/> (last accessed mar. 25, 2009); see also “The Palm Software Store has gone mobile”, <http://appstore.pocketgear.com/palm/> (last accessed Mar. 25, 2009).

<sup>16</sup> See 2008 Farm Bill § 6112 (a)(1)(D) (rural broadband strategy must “identify how specific Federal agency programs and resources can best respond to rural broadband requirements and overcome obstacles that currently impede rural broadband deployments.”).

the lowering of barriers to wireless broadband deployment imposed by other governmental actors.

**A. Remove Regulatory Incentives for Inefficiency and Arbitrage in Infrastructure Investment**

Currently, a patchwork of federal and state programs supports rural communications infrastructure development, including universal service, intercarrier compensation, and Department of Agriculture Rural Development loans and grants. As CTIA has pointed out, these programs need to be (1) better coordinated with one another and (2) modernized to reflect today's mobile and broadband world.<sup>17</sup>

The Commission currently has a proceeding open to comprehensively reform the universal service and intercarrier compensation rules.<sup>18</sup> This proceeding is probably more central than any other to the future of broadband deployment in rural America. CTIA filed comments in that proceeding which it incorporates by reference here.<sup>19</sup> The crucial point is that the universal service and intercarrier compensation regimes must be fundamentally reformed to focus on mobility and broadband.

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<sup>17</sup> See, e.g., Comments of CTIA, WC Docket No. 05-337 and CC Docket No. 01-92 (filed Nov. 26, 2008). See also 2008 Farm Bill § 6112(a)(1)(A)-(B) (rural broadband plan should “promote interagency coordination” and “coordinate existing Federal rural broadband or rural initiatives”).

<sup>18</sup> See, e.g., *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Lifeline and Link Up; Universal Service Contribution Methodology; Numbering Resource Optimization; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Developing a Unified Intercarrier Compensation Regime; Intercarrier Compensation for ISP-Bound Traffic; IP-Enabled Services*; , WC Docket No. 05-337; CC Docket No. 96-45; WC Docket No. 03-109; WC Docket No. 06-122 122, CC Docket No. 99-200; CC Docket No. 96-98; CC Docket No. 01-92; CC Docket No. 99-68; WC Docket No. 04-36; Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, FCC 08-262 (rel. Nov. 5, 2008) (the “*USF/ICC FNPRM*”).

<sup>19</sup> Comments of CTIA, WC Docket No. 05-337 (filed Nov. 26, 2008).

The existing universal service program is rooted in monopoly-era wireline voice telephony policies, and has so far failed to shake itself loose of this history. Because broadband deployment, economic opportunity, and technological innovation are no longer exclusively or even predominantly found on any single platform, federal policies must address and encourage the deployment and availability of mobile wireless voice, data, and video services. Policies designed solely to benefit certain competitors or technologies disserve consumers and violate the Act. The Commission must ensure that federal policies reflect fundamental changes in technology and consumer preference, and are not simply a means for perpetuating outdated technologies or failing business models consumers no longer desire.

In light of the new realities of technology and consumer demand discussed above,<sup>20</sup> the statute's universal service provisions require the Commission to commit funding for the deployment and maintenance of advanced wireless networks. Section 254 of Act demands that universal service support mechanisms provide "specific, predictable, and sufficient" support to ensure that consumers in high-cost rural areas have access to services that are "comparable" to those available in urban areas.<sup>21</sup> Mobile services, and more specifically, mobile broadband services, are broadly available and highly valued by all consumers.<sup>22</sup> Thus, rural consumers have a right to expect the universal service system to ensure their access to wireless services that are "comparable" to those provided in urban areas. The universal service principle of competitive neutrality<sup>23</sup> also requires that the system treat wireless services, and the carriers that

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<sup>20</sup> See *supra* Section I.

<sup>21</sup> 47 U.S.C. § 254(b)(5), (e).

<sup>22</sup> See *supra* Section I.

<sup>23</sup> 47 U.S.C. § 254(b)(7) (permitting the Joint Board to recommend, and the Commission to adopt, additional universal service principles); *Federal-State Joint Board on Universal Service*, (continued on next page)

provide them, evenhandedly with other providers. To the extent, then, that federal mechanisms support rural consumers' access to wireline service, they must support rural consumers' access to the benefits of wireless service as well. This support should similarly encompass both infrastructure deployment and ongoing maintenance and operations costs, and should measure all providers' costs in an objective and efficient manner.<sup>24</sup> Intercarrier compensation reform must include a transition to a unified, cost-based rate for the termination of all telecommunications traffic based on an objective and efficient measure of costs with fair default interconnection rules.<sup>25</sup>

As the extensive records in the universal service and intercarrier compensation dockets reveal, existing universal service and intercarrier compensation policies include enormous incentives for inefficiency and regulatory arbitrage. This regulatory underbrush stands in the way of federal broadband deployment goals and the statutory universal service mandate and it is not sustainable in light of today's technological and marketplace conditions. As a result, the Commission should include as a key element of its rural broadband plan (and, indeed, its national broadband strategy) a commitment and vision for reforming the universal service and intercarrier compensation systems for the 21<sup>st</sup> century.

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CC Docket No. 96-45, Report & Order, 12 FCC Rcd 8776, 8801 ¶ 47 (1997) ("*First Universal Service Order*"), *aff'd sub nom. Texas Office of Pub. Util. Counsel v. FCC*, 183 F.3d 393 (5th Cir. 1999) (adopting the competitive neutrality principle). Because it has been validly adopted under Section 254(b)(7), the competitive neutrality principle applies to the Commission with the same force as the other statutory Section 245(b) principles.

<sup>24</sup> Providers such as wireless carriers that operate in a competitive marketplace should not be required to submit to monopoly-era cost and revenue accounting rules in order to receive support. Comments of CTIA, WC Docket No. 05-337 (filed Nov. 26, 2008) at 11-16.

<sup>25</sup> Comments of CTIA, WC Docket No. 05-337 and CC Docket No. 01-92 (filed Nov. 26, 2008) at 21-36.

## **B. Eliminate Barriers to Bringing New Service to Rural Communities**

The Commission's plan for deploying broadband to rural areas should ensure that state and local zoning processes are not a barrier to deployment. The ability to deploy wireless systems and expand wireless service in rural areas (and throughout the country) depends on the availability of sites for the construction and placement of towers and transmitters – and the local zoning approval process in many areas of the country has mired wireless build-out in unnecessary and counterproductive delay. The Commission should grant CTIA's pending Petition for Declaratory Ruling<sup>26</sup> on establishment of a tower "shot clock," recognizing the balance established by Congress between state and local zoning authority and federal deployment imperatives.

Deploying wireless broadband to rural areas can be a daunting task. An economic analysis commissioned by CTIA concluded that in order to achieve ubiquitous 3G mobile broadband coverage, approximately 16,000 new towers will need to be constructed and 55,000 existing towers will need to be augmented.<sup>27</sup> New facilities are especially critical in light of the aggressive build-out requirements associated with recently auctioned 700 MHz spectrum – requirements that are "the most stringent ever imposed by the Commission"<sup>28</sup> and meant to

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<sup>26</sup> Petition to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance, WT Docket No. 08-165, Petition for Declaratory Ruling (filed July 11, 2008) ("Tower Shot Clock Petition").

<sup>27</sup> CostQuest Associates, *U.S. Ubiquitous Mobility Study: Identification of and Estimated Initial Investments to Deploy Third Generation Mobile Broadband Networks in Unserved and Underserved Areas* at 4, attached as Appendix A to Comments of CTIA, WC Docket No. 05-337 (filed April 17, 2008).

<sup>28</sup> See *Applications for License and Authority to Operate in the 2155-2175 MHz Band*, WT Docket No. 07-16, *Order*, 22 FCC Rcd 16563, n.52 (2007).

“ensure that this spectrum is put to use quickly in both urban and rural areas.”<sup>29</sup> Additional wireless facilities would also advance the public safety goals of E911 and public safety communications by enhancing coverage and capacity.

Unfortunately, ambiguities in the Act have allowed some zoning authorities to erect substantial impediments to wireless facility siting and the provision of wireless services. The record in the *Tower Shot Clock* proceeding makes clear that the problems identified by the Petition are real and require action, and the rural broadband plan is a fitting context for such leadership.<sup>30</sup>

Recent developments in the economy have made this issue even more pressing. Commission reports indicate that commercial mobile radio service providers made approximately \$21 billion in capital expenditures in 2004, \$25 billion in 2005, and another \$25 billion in 2006.<sup>31</sup> As credit markets contract, excessive tower siting delay is even more likely than usual to divert available capital away from such projects and toward other uses not as susceptible to uncertainty and delay. Especially at this time, the Commission should clear regulatory hurdles to private sector investment and stimulus projects intended to spur immediate deployment and create jobs. Burdensome state and local zoning processes should not delay these critical shovel-ready investments in tomorrow’s communications infrastructure.

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<sup>29</sup> *Service Rules for the 698-746, 747-762, and 777-792 MHz Bands*, Second Report and Order, 22 FCC Rcd 15289, 15558 (2008) (Statement of Chairman Kevin J. Martin).

<sup>30</sup> *See, e.g.*, Reply Comments of CTIA, WT Docket No. 08-165 (filed Oct. 14, 2008) at 4-8 (detailing examples).

<sup>31</sup> *Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Wireless Services*, Twelfth Report, 23 FCC Rcd 2241, 2307 ¶ 154 (2008).

To address these serious concerns, CTIA's petition establishes certain common-sense safeguards to ensure state and local zoning processes do not undermine federal broadband goals.

These safeguards include:

- Clarifying the time periods in which a state or locality must act on wireless facility siting requests before a "failure to act" will be found under Section 332(c)(7)(B) (45 days for collocations; 75 days for all other facilities).
- Finding that, in the event that a failure-to-act benchmark is triggered, the application should be deemed granted. In the alternative, establish a presumption that, once judicial review is triggered by a failure to act, a wireless carrier is entitled to an injunction ordering the state or local zoning authority to grant the siting application unless the authority can justify the delay.
- Clarifying that the statute bars zoning decisions that have the effect of prohibiting an additional entrant from offering service in a given area.
- Issuing a declaration that zoning ordinances requiring variances for all wireless siting requests will be struck down if challenged in the context of a Section 253 petition.

The Commission can address these issues without intruding on privileges reserved to the states. It was *Congress* that expressly inserted federal concerns into the tower siting process, limiting traditional local authority, when it promulgated section 332(c)(7). As the Supreme Court has noted, section 332(c)(7) was designed to reduce "the impediments imposed by local governments upon the installation of facilities for wireless communications, such as antenna towers,"<sup>32</sup> and hence "imposes specific limitations on the traditional authority of state and local authorities to regulate the location, construction, and modification" of the facilities necessary for wireless communications.<sup>33</sup>

The rural broadband plan should include a strategy for addressing significant barriers to wireless deployment, and there is no greater barrier than tower siting delays. The relief sought

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<sup>32</sup> *City of Rancho Palos Verdes v. Abrams*, 544 U.S. 113, 115 (2005).

<sup>33</sup> 544 U.S. at 115.

by CTIA's *Tower Shot Clock* Petition eliminates this barrier. Grant of the Petition should be included in the Commission's rural broadband plan (as well as the comprehensive national broadband strategy).

## CONCLUSION

The 2008 Farm Bill has created a unique vehicle and opportunity for the FCC and the Department of Agriculture to work together to craft a long-overdue unified rural broadband strategy. The recent enactment of the Recovery Act builds on this foundation by adding funding and calling for the creation of a national broadband plan. The FCC can advance these critical policy goals by reforming universal service and intercarrier compensation to better ensure that rural Americans benefit from mobile broadband solutions and by streamlining state and local zoning processes to facilitate wireless broadband investment. Taken together, these steps will help to ensure that rural America's economic recovery will be built on ubiquitous mobile broadband connectivity that will bring jobs, improved health care, enhanced public safety and stronger families to its rural citizens.

Respectfully submitted,

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March 25, 2009