



supplemental reverse auction to allow for participation regarding eligible census blocks not on the current FCC list.

## **II. Comments**

In the February 2, 2012 Public Notice, the FCC indicates a census block will be eligible for Phase I Mobility Funding if:

- 1) it does not currently have 3G or better wireless coverage in the center of the census block; and
- 2) it contains primary, secondary, local and rural roads as well as city streets; and
- 3) a carrier has not made regulatory commitments or received funding to provide 3G or better service (e.g. Broadband Technology Opportunities Program (BTOP)); and
- 4) a carrier cannot receive Phase I Mobility Funding if it has made commitments to deploy 3G or better service by December 31, 2012.

The staff of the Communications Division of the Indiana Utility Regulatory Commission (“Indiana Staff”) has reviewed and analyzed the FCC’s GIS data of census blocks identified as unserved or underserved. Indiana Staff also compared the FCC’s GIS data of census blocks identified as unserved or underserved with wireless coverage data collected by the Indiana Office of Technology (“IOT”). IOT is the state agency that has collected broadband availability data in Indiana under a grant from the National Telecommunications and Information Administration.

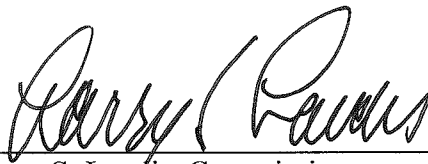
In the course of its review, Indiana Staff has identified a number of census blocks that, based on wireless coverage data from IOT, appear to meet criteria Nos. 1 and 2 above, but were not included in the list of census blocks presumed to be eligible for participation in the September 27, 2012, reverse auction. Unfortunately, the Indiana Utility Regulatory Commission does not have access to information about regulatory commitments made regarding wireless service deployment or carriers’ intentions to provide 3G or better wireless service in the coming year. Nor do we have access to providers’ business plans that may impact the census blocks so identified. As a result, it is unclear whether these criteria (Nos. 3 and 4) are the reason certain census blocks that appear to meet criteria Nos. 1 and 2 are not on the list prepared by the FCC. Attached to these comments is a partial list of the census blocks that appear to meet criteria

Nos. 1 and 2 but are not included on the FCC's list. Although the Indiana Staff would have preferred that the attached list of 534 unserved census blocks (Attachment A) not included in the FCC's list was an exhaustive listing, this was not possible due to the shortness of time between the release of the necessary data by the FCC and the deadline for comments on this issue. Sample maps are also attached (Attachments B through F) to illustrate the process used by Indiana Staff. It is our intention to file supplemental/reply comments with a more complete list.

Considering that inclusion on the FCC list determines whether Mobility Fund support is available for a particular area, the FCC should take additional steps to assure the accuracy of the FCC list. The attached list and maps of census blocks are offered as additional information for the FCC to consider as to the accuracy of the American Roamer data.

As discussed above, with the shortness of the timeframe between the release of data by the FCC and the deadline for comments on census block eligibility, there is a high likelihood that the FCC list does not contain all of the eligible census blocks. Consequently, the FCC should strongly consider a supplementary reverse auction for census blocks that may not have been accurately identified as unserved or underserved for participation in September 27, 2012, reverse auction using the American Roamer data.

Respectfully submitted this 16th day of March, 2012



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Larry S. Landis, Commissioner  
Indiana Utility Regulatory Commission

# Partial List of Indiana Census Blocks without Wireless Coverage Not Included in American Roamer Data

(Source: Indiana Office of Technology)

180499535001032	180499530002068	180499532001082	180499532003030
180499535001049	180499530002067	180499533001059	180499532001061
180499535001018	180499535001047	180499532001052	180499532003054
180499535001035	180499530002003	180499532001057	180499532003016
180499535001009	180499530002065	180499532002038	180499532001039
180499535001033	180499535001071	180499533001081	180499532001056
180499530002046	180499535001046	180499532002002	180499534001032
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180499535001004	180499535001050	180499533001051	180499532002000
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180499530002002	180499535001007	180499532002012	180499532001037
180499530002066	180499535001000	180499532001059	180499532001054
180499535001048	180499535001015	180499532001038	180499532003040
180499535001069	180499535001012	180499532002016	180499532001077
180499530002070	180499535001008	180499532002010	180499533001061
180499535001026	180499535001002	180499532003053	180499532001040
180499530002048	180499535001013	180499532002003	180499532002045
180499530002064	181039520002004	180499532002011	180499532002004
180499530003002	181039520001034	180499532003067	180179511003113
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180499535001016	180499532003058	180499532002017	180179511003028
180499535001042	180499532002040	180499532002037	180179511003029
180499535001057	180499532002036	180499532003062	180179511003093
180499535001006	180499533001082	180499534001030	180179511003078
180499535001034	180499534001033	180499533001083	180179511003084
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180499530002045	180499532003066	180499534001034	180179511002118
180499530002044	180499532002015	180499532001036	180179511003079
180499535001020	180499534001118	180499532003057	180179518004203

# Partial List of Indiana Census Blocks without Wireless Coverage

## Not Included in American Roamer Data

(Source: Indiana Office of Technology)

180179511003000	180179511002083	180179511003043	181210303005025
180179511003010	180179510001107	180179511003056	181210303001048
180179511002107	180179510002002	180179511002123	181210303001050
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180179511002087	180179511003025	180179518004230	181210302003019
180179511002116	180179511003003	180179518004080	181210303002003
180179511003110	180179511002117	180179511003090	181210303002023
180179511003051	180179511002105	180179511003086	181210303001045
180179510002003	180179511002112	180179511003085	181210303004034
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180179511003087	180179511003005	181210304002036	181210303005012
180179510001113	180179511003039	181210303001076	181210303005045
180179511003035	180179511003013	181210303001077	181210303003011
180179511003063	180179511003030	181210304002006	181210303003010
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180179511003026	180179511003002	181210303003016	181210303005023
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180179511003109	180179511003007	181210302003037	181210303005009
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180179511003107	180179511002104	181210303001010	181210303001066
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180179511003044	180179511002106	181210304002037	181210303003021
180179511003008	180179511003024	181210304006013	181210303001024
180179511003041	180179511003006	181210304002000	181210303001029
180179511003102	180179511003027	181210304006005	181210301003081
180179511003058	180179511003037	181210303005041	181210301003084
180179511003032	180179511003038	181210303003036	181210302001014

Partial List of Indiana Census Blocks without Wireless Coverage  
Not Included in American Roamer Data

(Source: Indiana Office of Technology)

181210303004012	181210303001067	181210304002012	181210303001017
181210302003014	181210303002005	181210304002004	181210303005035
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181210302003040	181210303001031	181210303004006	181210303005052
181210302001018	181210303002020	181210303004008	181210303005002
181210302001002	181210303002013	181210302001010	181210303005028
181210301004131	181210303001044	181210303005039	181210304002030
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181210304002001	181210303001047	181210303001038	181210302003000
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181210303005026	181210302002063	181210303001062	181210304002031
181210303003005	181210302001070	181210301003083	181210304002005
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181210303003013	181210304002038	181210303003025	181210303001005
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181210303002022	181210303003000	181210303002008	181210303002000
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181210303002011	181210303001034	181210303001028	181210303003012
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181210303005014	181210303004011	181210303001054	181210303005010
181210303003044	181210302001075	181210303002015	181210303005038
181210303005042	181210304006001	181210303001004	180499534001046
181210303005053	181210304004088	181210303002014	180499534001048

# Partial List of Indiana Census Blocks without Wireless Coverage

## Not Included in American Roamer Data

(Source: Indiana Office of Technology)

180499533001089

180499534001047

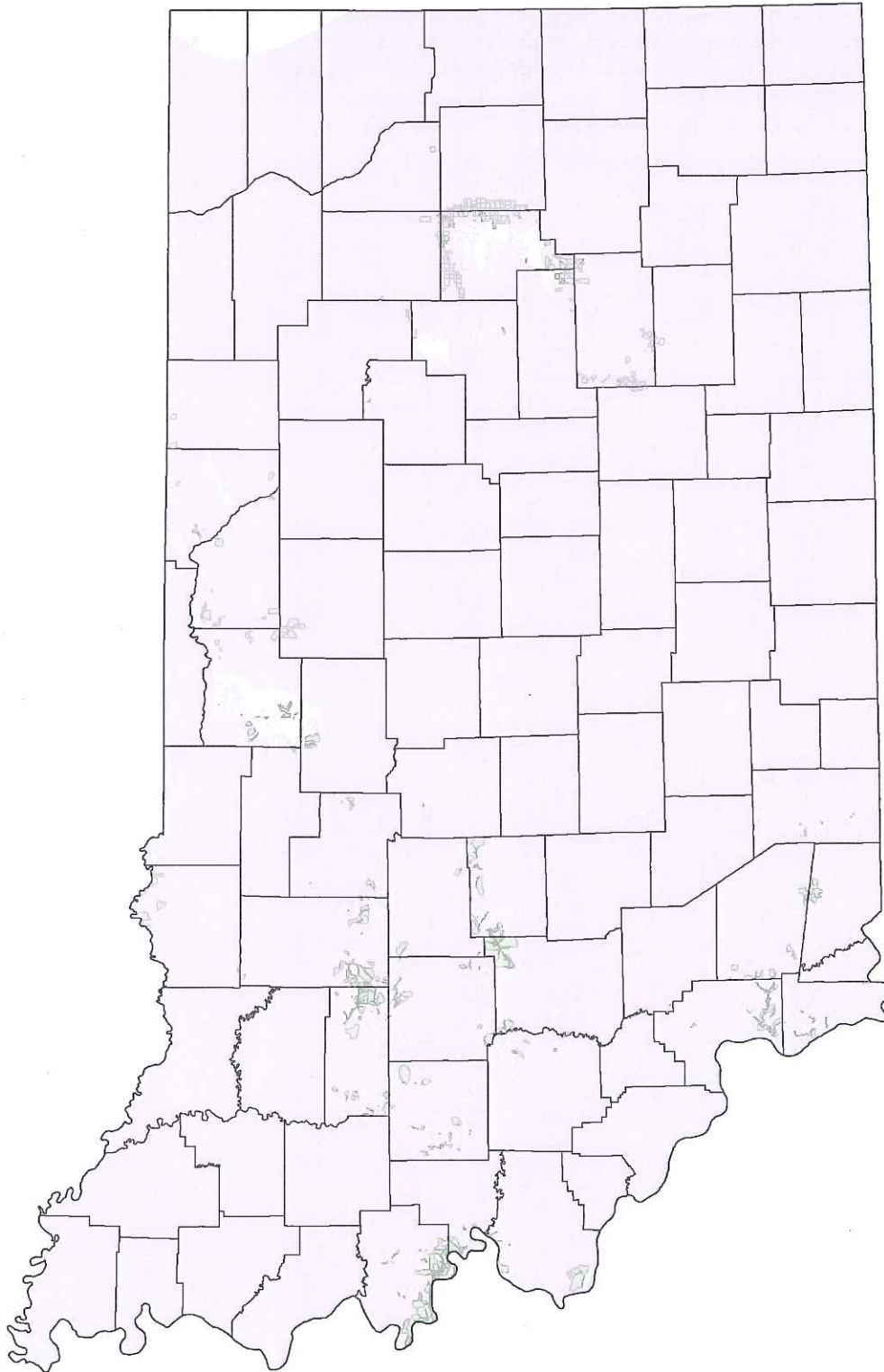
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

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# Wireless Coverage State of Indiana

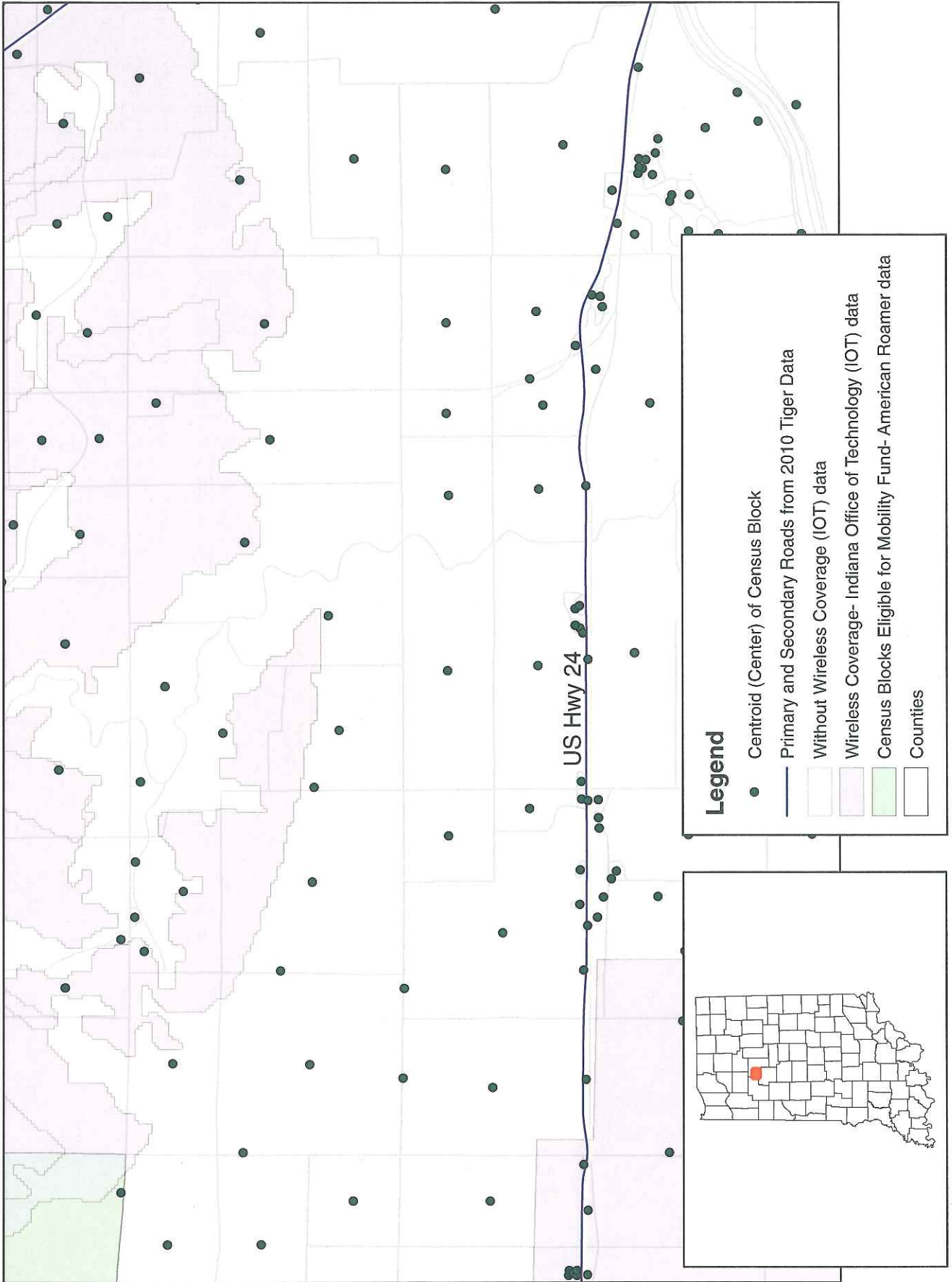


## Legend

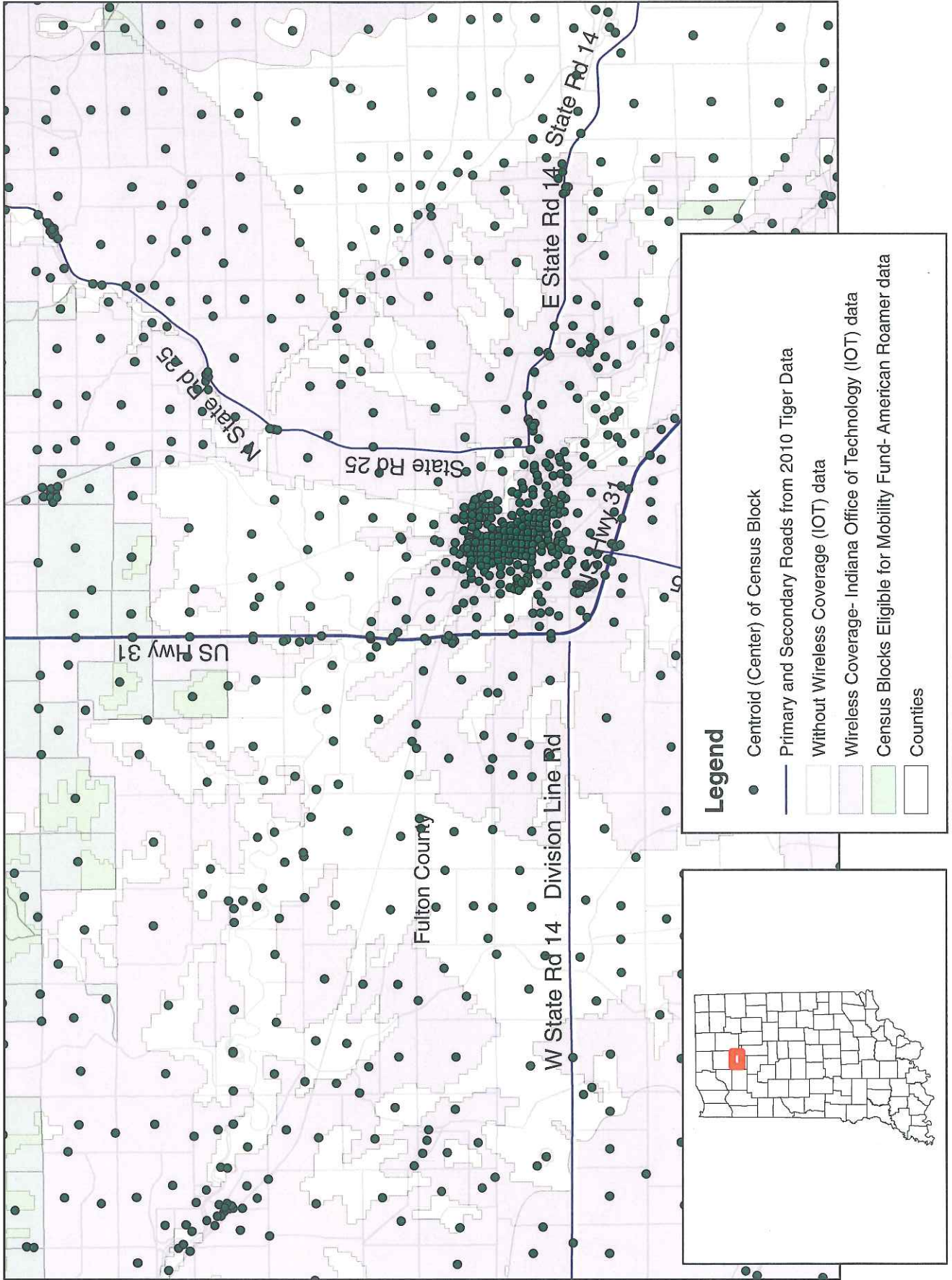
-  Wireless Coverage- Indiana Office of Technology (IOT) data
-  Census Blocks Eligible for Mobility Fund- American Roamer data
-  Counties



# Wireless Coverage of Census Block Centroids Cass County



# Wireless Coverage of Census Block Centroids Fulton County



# Wireless Coverage of Census Block Centroids Parke and Putnam Counties

