October 30, 2015

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re:   Ex Parte Presentation – Methodology for Connect America Fund Recipients to Measure and Report Speed and Latency Performance to Fixed Locations (WC Docket No. 10-90)

Dear Ms. Dortch:

On October 29, 2015, the undersigned and Ken Ko of ADTRAN, Inc. (“ADTRAN”) met with the following staff from the Wireline Competition Bureau: Chris Cook, Suzanne Yelen, Roger Woock, Cathy Zima and Alec MacDonell. ADTRAN explained that just over a year ago, the Wireline Competition Bureau, Wireless Telecommunications Bureau, and Office of Engineering Technology jointly issued a Public Notice seeking comment on a methodology for Connect America Fund (“CAF”) recipients to measure broadband speed and latency performance for fixed locations.\(^1\) ADTRAN urged the Commission to resolve these issues expeditiously.

In its previous comments on this issue, ADTRAN urged the Commission to adopt "a robust measurement program" that was "effective but efficient."\(^2\) ADTRAN believes that recent developments reinforce the need for a thorough, well-defined monitoring program. As

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\(^2\) See, Comments of ADTRAN in WC Docket No. 10-90, filed December 22, 2014 at pp. 6 and 1.
Volkswagen's apparent use of "defeat" software demonstrates, an unscrupulous service provider could attempt to manipulate the Commission's monitoring program.

ADTRAN also explained that since the incumbent carriers have recently accepted $1.5 billion in annual support under CAF Phase II, those carriers are refining and finalizing their design and engineering work for deployment of these broadband services. However, based on discussions ADTRAN has had with potential customers, presently there is some uncertainty with regard to how the broadband speeds and latency performance will be measured to ensure that the deployed services comply with the CAF Phase II requirements. The measurement specifications and methodologies can affect network design, particularly for broadband deployment segments that utilize “shared” capacity, such as backhaul from remote terminals or fixed wireless end user links. Thus, prompt resolution of the measurement methodology issues will help avoid delays in deployment of broadband service to these unserved or underserved customers.

At this meeting, ADTRAN presented and explained the attached analyses concerning issues that arise when designing a broadband network that uses “shared” capacity, which would comply with the CAF Phase II requirements. As one example, the presentation addressed the capabilities of LTE fixed wireless broadband in terms of number of subscribers that can be supported in each sector. That analysis demonstrated that even with the somewhat greater efficiency of LTE, fixed wireless broadband service would appear to be able to meet the CAF Phase II minimum speed requirements only for very low-density deployments. ADTRAN also discussed how a similar analysis would assess the impact of backhaul or middle mile infrastructure on the ability of a broadband service provider to meet the CAF Phase II 10/1 Mbps minimum specifications. In addition, we discussed the need to ensure that any measurement program was not too burdensome, particularly for small providers, and that the measurements themselves did not utilize significant capacity so as to slow down the networks.

In sum, ADTRAN urged the Commission to resolve expeditiously the issue of specifying a methodology for CAF recipients to measure and report speed and latency performance to fixed

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4 FCC New Release, “Carriers Accept Over $1.5 Billion in Annual Support from Connect America Fund to Expand and Support Broadband for Nearly 7.3 Million Rural Consumers in 45 States and One Territory,” August 27, 2015.
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locations, taking into account ADTRAN’s recommendations in its earlier filings and the information presented at this ex parte meeting.

Sincerely,

/s/
Stephen L. Goodman
Counsel for ADTRAN, Inc.

cc: Suzanne Yelen
Roger Woock
Cathy Zima
Alec MacDonnell
Christopher Cook