

DR 16: Please explain and describe, with specificity, why the indicated signal coverage as shown on Appendix 4 to USCOC's "Compliance Filing" of August 11, 2006 appears to be significantly larger for any given tower location than the signal coverage for any given tower location shown on USCOC's propagation analysis submitted and presented previously in this case.

Response: U.S. Cellular timely objected to this Data Request as being not reasonably calculated to lead to the production of relevant evidence. The Data Request seeks information regarding U.S. Cellular's prior list of proposed sites, which is not at issue in this case. U.S. Cellular's prior list of proposed sites was replaced with its 2-year network improvement plan in its August 11 compliance filing. Notwithstanding this objection, U.S. Cellular responds as follows:

Several factors may have contributed to the appearance of greater signal coverage on the 'existing coverage' map included in the August 11 compliance filing. First, as noted in response to DRs 14 and 15 above, the company added numerous cell sites in the time period between the production of the two maps. There may be instances in which the coverage area for a site appearing on the 2005 map appears significantly larger in the 2006 map, when in fact the greater coverage area resulted from the addition of a nearby tower.

Second, U.S. Cellular produces coverage maps based on the best information available at the time. Furthermore, U.S. Cellular continually strives to improve engineering processes and uses the best and most current data available. In one such example, U.S. Cellular "tuned," or adjusted, the propagation model it uses in determining predicted signal coverage in late 2005. This tuning was performed after the company conducted drive tests to verify signal strength in different portions of its Missouri network. It is standard industry practice to confirm coverage with drive tests and adjust or replace propagation models to improve system design. This often results in significant changes in predicted coverage.

Signature: _____ /s/

Name: _____ Nick Wright

Position: _____ Vice President -- West Operations