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September 1, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, DC 20554

Re: WT Docket No. 15-91

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206(b), provided herewith is notice of an oral ex parte presentation in connection with the above-captioned proceeding. On August 30, 2016, Doug Updegraff, Tim Ash, Jackie Straight, Jody Benham and Troy Reynolds, on behalf of Bluegrass Cellular Inc. and its affiliates (jointly "Bluegrass Cellular"), participated in a conference call with James Wiley and Rasoul Safavian of the Policy and Licensing Division of the Public Safety & Homeland Security Bureau.

The parties discussed evolving technologies for Wireless Emergency Alerts (WEA) and participation by smaller Commercial Mobile Service Providers such as Bluegrass Cellular.

Bluegrass Cellular explained that it expects to be able to comply with expanded WEA rules if provided adequate lead time, and if the required technology is available from key providers. For example, expanding the scope of embedded references, adding Alert Classifications, and adding characters to Alert Messages presumes that Bluegrass Cellular's Alert Gateway provider delivers such capabilities. Geo-targeting Alert Messages is feasible if a solution is embedded within the handset produced by manufacturers. Any new FCC rules addressing immediate display of Alert Messages on devices should permit prioritization of display by the device according to its technology.

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The parties discussed Bluegrass Cellular's Alert Message logging practices, as well as the company's ability to convey Alert Messages in Spanish and to adopt WEA testing requirements over time.

Respectfully submitted,

A handwritten signature in black ink that reads "Pamela L. Gist". The signature is written in a cursive style with a large initial 'P' and a distinct 'L'.

Pamela L. Gist  
Counsel for Bluegrass Cellular, Inc.

Enclosures

cc: James W. Wiley, III  
Rasoul Safavian  
Stephanie Winkler