

November 23, 2015

***Via Electronic Filing***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation  
Assessment and Collection of Regulatory Fees for Fiscal Year 2015  
MD Docket No. 15-121**

Dear Ms. Dortch:

On November 20, 2015, CTIA – The Wireless Association® (“CTIA”), represented by Krista Witanowski, Assistant Vice President, and Adam Krinsky, outside counsel, met with Tom Buckley and Mika Savir regarding the above-captioned proceeding. Consistent with its initial comments, CTIA urged the Commission to reject proposals to subject commercial mobile radio service providers to interstate telecommunications service provider (“ITSP”) fees, which would violate Section 9 of the Communications Act and be arbitrary and capricious as well. Further, CTIA discussed that the Commission should refrain from cherry-picking full time employees (“FTEs”) for reclassification, which would inappropriately shift regulatory costs from Wireline Competition Bureau or Media Bureau regulatees to others.

Sincerely,

*/s/ Krista Witanowski*

Krista Witanowski  
AVP Regulatory Affairs  
CTIA – The Wireless Association®

cc: Tom Buckley  
Mika Savir