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April 2, 1999

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth St., N.W.  
Washington, D.C. 20554

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APR 02 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Federal-State Joint Board on Universal Service,  
CC Docket No. 96-45

Dear Ms. Salas:

I am writing on behalf of Western Wireless Corporation ("Western Wireless") to notify you of several *ex parte* contacts relating to the proceeding referred to above. Gene DeJordy, Executive Director of Regulatory Affairs for Western Wireless, and I met with several FCC Commissioners' advisors as well as staff from the Common Carrier Bureau ("CCB") and Wireless Telecommunications Bureau ("WTB") on March 31 and April 1 to discuss the issues outlined below.

Specifically, on March 31, Western Wireless met with Dan Connors, advisor to Commissioner Susan Ness; Office of Plans and Policy staff members Roz Allen, Evan Kwerel, John Williams, Pam Megna, Marilyn Simon, and Jason Oxman; Karen Gulick, advisor to Commissioner Gloria Tristani; Steve Weingarten, Chief of the WTB's Commercial Wireless Division; and Peter Tenhula, advisor to Commissioner Michael Powell. On April 1, Western Wireless met with Irene Flannery, Chief of the CCB's Accounting Policy Division; Linda Kinney, advisor to Commissioner Ness; Thomas Sugrue, WTB Chief, and WTB staff Kathleen Ham (Deputy Bureau Chief), Jeanine Poltronieri, and Steve Weingarten; Larry Strickland, CCB Chief, and CCB staff Lisa Zaina (Deputy Bureau Chief), Charles Keller, Catherine Schroder, and Richard Cameron; Thomas Power, advisor to Chairman William Kennard; and Kyle Dixon, advisor to Commissioner Powell.

During these conversations, we discussed matters addressed in Western Wireless's previously-filed comments in this proceeding, as well as positions outlined in the enclosed documents. We emphasized the following issues:

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- Western Wireless and other wireless carriers are having difficulties in getting designated as eligible telecommunications carriers (“ETCs”) for federal universal service support, which will slow wireless carriers’ entry into rural markets as competitive universal service providers. To address this problem, the Commission should clarify the requirements that states must follow in designating carriers under section 214(e)(2) of the Telecommunications Act of 1996 and the Commission’s rules. The Commission should also consider designating wireless carriers as ETCs for federal support under section 214(e)(6) of the Act.
- To enable prospective competitive entrants to target particular rural areas for entry, high-cost funding should be distributed on a geographically disaggregated basis (e.g., by wire centers), rather than on an averaged basis such as study areas or statewide.
- Wireless carriers offering portable wireless local loop services, such as Western Wireless’ offering in Regent, North Dakota, should not be subjected to inconsistent state-by-state regulations or burdensome certification requirements. State regulation of fixed or quasi-fixed wireless services will delay or prevent the deployment of wireless local loop competition to wireline service in residential areas.

Please contact me if you have any questions about this filing.

Respectfully submitted,



Michele C. Farquhar  
Counsel for Western Wireless Corp.

Enclosures

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cc: Dan Connors  
Roz Allen  
Evan Kwerel  
John Williams  
Pam Megna  
Marilyn Simon  
Jason Oxman  
Karen Gulick  
Steve Weingarten  
Peter Tenhula  
Kyle Dixon

Irene Flannery  
Linda Kinney  
Thomas Sugrue  
Kathleen Ham  
Jeanine Poltronieri  
Larry Strickland  
Lisa Zaina  
Charles Keller  
Catherine Schroder  
Richard Cameron  
Thomas Power