

ORIGINAL

# RURAL TELECOMMUNICATIONS GROUP

*the voice of rural wireless telecommunications providers*

1000 Vermont Avenue, 10<sup>th</sup> Floor  
Washington, D.C. 20005

## MEMORANDUM

RECEIVED

To: Magalie Roman Salas, Secretary  
Federal Communications Commission

From: Caressa D. Bennet, Regulatory Counsel

Date: September 10, 1999

Re: Oral *Ex Parte* Presentation- September 10, 1999

SEP 10 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

***In Re* Revision of the Commission's Rules to Ensure Compatibility  
With Enhanced 911 Emergency Calling Systems  
CC Docket No. 94-102**

**Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions  
to Part 27 of the Commission's Rules  
WT Docket No. 99-168**

***In Re* Truth-in-Billing and Billing Format  
CC Docket No. 98-170**

---

Today, Caressa D. Bennet and Gregory W. Whiteaker, of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group ("RTG"), participated in a telephone conference call with Stephen Weingarten, Chief of the Commercial Wireless Division and members of the Federal Communications Commission's ("FCC's" or "Commission's") Wireless and Common Carrier Bureaus concerning issues relating to the above proceedings. Also participating in the call were RTG members Colorado Valley Telephone Cooperative, represented by Mark Rutherford, Assistant General Manager; and Leaco Rural Telephone Cooperative, represented by John Smith, General Manager. David Konooch of the Common Carrier Bureau, and Rose Crellin, Leora Hockstein, Art Lechtman and Diane Connelly of the Wireless Telecommunications Bureau also participated in the call.

The representatives of RTG discussed arguments contained in RTG's comments and reply comments in the truth-in-billing and UHF spectrum reallocation proceedings referenced above. With respect to E911, RTG expressed concern at the lack of federal guidelines for state regulators adopting cost recovery mechanisms. RTG encouraged the FCC to adopt uniform federal guidelines.

Pursuant to rule Section 1.1206(b)(2), one original and six (6) copies of this memorandum are being herewith submitted to the Secretary of the Commission, summarizing additional data and arguments presented at the meeting.