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1200 Nineteenth Street, N.W.
Washington, D.C. 20036-2412
www.piperrudnick.com

E. ASHTON JOHNSTON

ashton.johnston@piperrudnick.com
PHONE (202) 861-6665

PHONE (202) 861-3900
FAX (202) 223-2085

June 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERY

Magalie Romas Salas, Secretary
Federal Communications Commission
445 - 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Ex Parte Communication, WT Docket No. 97-82

Dear Ms. Salas:

On behalf of STPCS Joint Venture, LLC d/b/a SOL Communications ("STPCS"), and pursuant to Section 1.1206(b) of the Commission's rules, notice is hereby given of an ex parte meeting on June 27, 2000 between Jonathan Foxman and Julia K. Tanner, Esq., both of STPCS, the undersigned, and Clint Odom, legal advisor to Chairman Kennard. Attached for inclusion in the record of WT Docket No. 97-82 are two copies of STPCS's presentation to Mr. Odom.

Kindly direct any comments regarding this submission to the undersigned.

Sincerely,


E. Ashton Johnston

EAJ/cce
Enclosures

No. of Copies rec'd 041
List A B C D E



- The Commission Should Let DEs Assign or Transfer Licenses to Non-Designated Entities
 - Lifting the transfer restriction will facilitate access to capital for DEs, enabling continued growth of successful entrepreneurial licensees
 - Non-DEs are not subject to this restriction. Lifting the restriction will permit DEs to compete on a fair and level playing ground.

In touch with you



- Let DEs Assign or Transfer to Non-DEs Only After:
 - (1) License Price and Unjust Enrichment Are Paid to the Commission in Full
 - Promotes fairness consistent with the Commission's rules
 - Promotes fairness to non-DEs who paid for licenses up-front
 - (2) First Construction Benchmark is Met
 - Helps ensure FCC service objectives are being met
 - Assurance that designated entity obtained financing, hired employees, and deployed system rather than merely holding licenses

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