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April 4, 2001

**RECEIVED**

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

**APR 4 2001**  
**ORIGINAL**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: In the Matter of Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets**  
**WT Docket No. 00-230**  
**In the Matter of Automatic and Manual Roaming Obligations Pertaining to Commercial Mobile Radio Services**  
**WT Docket No. 00-193**  
**Ex Parte Meeting**

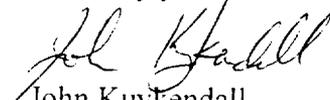
Dear Ms. Salas:

On April 3, 2001, Sylvia Lesse and John Kuykendall of Kraskin, Lesse & Cosson, LLP, counsel to the Rural Cellular Association ("RCA"), met with Commissioner Susan Ness and Mark Schneider to discuss the referenced matters. The participants discussed RCA's position regarding the public interest necessity for the Commission to promote the efficient utilization of spectrum already allocated to rural areas through a variety of methods, including the adoption of leasing arrangements which encourage and protect significant investment in the infrastructure required to provide service to sparsely-populated areas. Noting its stated concern that leasing arrangements are insufficient to meet the requirements of consumers living in rural areas, RCA emphasized the importance of the Commission's giving careful consideration to RCA's fill-in proposal as a means to ensure that spectrum is utilized in rural areas where demand warrants.

Additionally, the participants discussed RCA's position regarding the public interest necessity in maintaining the manual roaming requirement and the concerns voiced by RCA regarding the potential for discriminatory treatment of the customers of smaller and rural carriers by larger carriers seeking to impose inappropriate terms upon smaller carriers seeking the implementation or extension of roaming arrangements.

Please contact me if there are any questions regarding this matter.

Sincerely yours,

  
John Kuykendall

cc: Commissioner Susan Ness  
Mark Schneider