

In response to Alltel's ex parte notice of its December 17, 2001 meeting with Ms. Monica Desai of Commissioner Martin's office, we on behalf of Petroleum Communications, Inc. respectfully refer the Commission staff to our December 14, 2001 ex parte letter that addresses the signal strength issue. Our December 14 letter establishes the reasons why, as a matter of law, the status quo rule gives the Gulf carriers a 39 dbu signal strength at the coastline boundary. It also summarizes the reasons why the new rule the Commission adopts in this proceeding should reduce the Gulf carriers' signal strength to 32 dbu, so that it equals the signal strength land carriers have at the boundary. A copy of this comment is being e-mailed to Ms. Desai.

By: Richard S. Myers  
Myers Lazrus Technology Law Group  
1990 M Street, NW, Suite 200  
Washington, DC 20036  
(202) 296-0626