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June 5, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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JUN - 5 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Analog Standard: WT Docket No. 01-108
Notice of Ex Parte Presentation

Dear Ms Dortch:

On June 4, 2002, Sylvia Lesse of Kraskin, Lesse & Cosson, LLP, counsel to the Rural Cellular Association ("RCA"), met with Peter Tenhula and Tony Regenstreif of the Office of Chairman Powell to discuss the above-referenced matter.

Participants discussed the results of a recent survey of RCA members regarding the current deployment of analog systems and use of three-watt analog cellular phones (see attached Ex Parte Presentation filed with the Commission on May 22, 2002). Based upon the results of this survey, the RCA representative demonstrated that an extensive use of analog phones exists in rural markets. Accordingly, the Commission should retain the analog standard for a time period sufficient to allow for a reasonable migration to other technologies.

Very truly yours,


John Kuykendall

cc: Peter Tenhula
Tony Regenstreif

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May 22, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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MAY 22 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Analog Standard: WT Docket No. 01-108
Ex Parte Presentation

Dear Ms. Dortch:

On May 1, 2002, representatives from the Rural Cellular Association ("RCA") met with the Wireless Telecommunications Bureau to discuss information contained in the record regarding the need to maintain the analog standard as a requirement for cellular providers. In response to staff inquiry, additional information is hereby provided regarding this matter.

RCA surveyed its members to gather information regarding the current deployment of analog systems and use of three-watt analog cellular phones. Members responding to the information request are licensed to provide cellular service to some of the most rural areas in the country, with a combined geographic area comprising more than one quarter of the land mass of the United States, an area larger than Alaska and Texas combined.

1. Analog-only markets:

Twelve RCA members, serving rural areas in the western part of the United States and Appalachia, identified themselves as analog-only systems. In total, these members are licensed to provide cellular service to a geographic area larger than Texas. These analog-only systems provide service to areas that are in close proximity to metropolitan areas. Ten of the twelve members have service areas that either border MSAs or serve small portions of MSAs.

All twelve members report that they still sell three-watt analog phones. Nine of these members report that due to system design, subscribers must use three-watt analog phones in order to receive adequate service throughout most of their service area. These members also report that they do not intend to convert their systems to digital technology due to lack of customer demand and the high costs that cannot be recouped from their small subscriber base.

2. Analog-digital systems:

Twenty-seven members that operate analog-digital systems report that over 20 percent of their subscribers currently use analog-only phones. Half of these members report that over 60 percent of their subscribers use analog-only phones. Twenty of the twenty-seven members report that they still sell three-watt analog phones.

The twenty-seven members are licensed to serve rural areas and small communities in eighteen states, representing all regions of the United States except the Mid-Atlantic and New England regions. In total, these members are licensed to provide cellular service to a geographic area larger than Alaska. Twenty-four of these members serve areas that either border MSAs or serve small portions of MSAs.

3. Availability of three-watt analog phones

RCA members that still sell three-watt analog phones report that they obtain the phones by purchasing refurbished phones or new phones from Motorola or Audiovox. A few respondents report that Motorola has informed them that it has ceased manufacturing 3-watt analog phones.

Respectfully submitted,

RURAL CELLULAR ASSOCIATION

By: John Kuykendall

Sylvia Lesse
John Kuykendall

Its Attorneys

cc: Roger Noel