

RURAL TELECOMMUNICATIONS GROUP

advocate of rural wireless telecommunications providers

1000 Vermont Avenue, NW, 10th Floor
Washington, DC 20005

To: Office of the Secretary
Federal Communications Commission

From: Caressa D. Bennet, General Counsel
Kenneth C. Johnson, Director – Legislative and Regulatory

Date: March 25, 2003

Re: *Ex Parte* Presentation – March 24, 2003

WT Docket No. 02-381
CC Docket No. 94-102

On March 24, 2003, Caressa D. Bennet and Kenneth C. Johnson of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group (“RTG”), met with Barry Ohlson, Legal Advisor to Commissioner Jonathan Adelstein, to discuss the above-mentioned proceedings.

In the “rural” wireless Notice of Inquiry proceeding (WT Docket No. 02-381), RTG informed Mr. Ohlson of its serious doubts about the efficacy of the Commission’s partitioning and disaggregation mechanism as a tool for delivering spectrum to rural-based wireless carriers. RTG went on to commend the Commission for exploring new ways to deliver spectrum to rural consumers.

In the emergency 911 (“E911”) proceeding (CC Docket No. 94-102), RTG discussed the need for an equitable accuracy standard for rural-based wireless carriers. RTG noted how large, nationwide carriers may average their accuracy results in rural areas with the vast majority of their E911 calls which are received in urban areas in order to meet the FCC’s E911 location accuracy standards. In essence, nationwide carriers are able to provide limited accuracy in their rural regions and still meet the FCC’s accuracy standards. In sharp contrast, rural wireless carriers must essentially provide a higher accuracy standard in their mainly rural service areas. RTG argued that the Commission should consider an alternative E911 accuracy standard where a carrier will be deemed in compliance with the Commission’s accuracy rules if, as a network-based carrier, it employs the industry standard Time Difference of Arrival (“TDOA”) technology on all of its cell sites.

If you have any questions regarding this filing, please communicate directly with the undersigned.

