

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, DC 20036

(202) 857 3500

 ORIGINAL

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WRITER'S DIRECT DIAL  
(202) 828-9475

April 16, 2003

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APR 16 2003

Marlene H. Dortch, Secretary  
Office of Managing Director  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Federal Communications Commission  
Office of Secretary

**Re: Oral Ex Parte Presentation  
Virginia Cellular LLC  
Petition for Designation as an Eligible Telecommunications  
Carrier in the State of Virginia  
CC Docket No. 96-45**

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 CFR Section 1.1206, we hereby provide you with notice of an **oral ex parte** presentation in connection with the above-captioned **proceeding**. On Friday, April 11, 2003, Kick Morrow of Virginia Cellular LLC ("Virginia Cellular") and David LaFuria, counsel for Virginia Cellular, met with Commissioner Jonathan S. Adelstein and Barry Ohlson, the Commissioner's legal adviser for wireless issues. The purpose of the meeting **was** to discuss Virginia Cellular's pending application for Eligible Telecommunications Carrier ("ETC") status currently before the Commission. We also attach a copy of a map of Virginia Cellular's digital 800 CDMA coverage, which was distributed at the meeting.

At the meeting, Virginia Cellular's representatives reiterated the company's position as expressed in its prior filings in this docket, stressing the public benefits that would result from a prompt grant of its petition. The company emphasized that, with access to high-cost support now available only to incumbents, the company will be able to expand its network and begin to provide rural consumers with telecommunications service alternatives similar to those available in urban areas. The company noted that its petition is identical in every important respect to several other requests for ETC status that the Commission has granted. Additionally, the company emphasized that the ongoing review of the Commission's ETC rules does not provide a reason for further delay of an application that complies with current rules and policies.

The parties also discussed Virginia Cellular's request to redefine rural ILEC service areas pursuant to Section 214(e)(5) of the Communications Act of 1934, as amended. Specifically, Virginia Cellular's representatives responded to questions from Commissioner Adelstein and Mr. Ohlson regarding its commitment to provide service to the rural ILEC wire centers not entirely

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Page 2 of 2

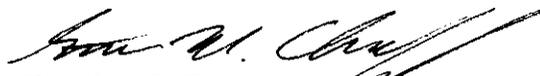
covered by the company's licensed service area. With respect to the Williamsville wire center (Mountain Grove Tel. Co.), Virginia Cellular stated its willingness to abide by a requirement to serve the entire wire center if the Commission *so* chooses, and to commit to find appropriate means of serving customers in the sliver of territory outside of its licensed service area.

With respect to the Schuyler wire center (Central Tel. Co.), Virginia Cellular's representatives stated that a decision to grant ETC status for the portion of this wire center that is within its licensed service area would be well-grounded in the Act and the Commission's rules. Nonetheless, in the event the Commission is unable to issue such a grant, the company stated its willingness to accept a grant that designates the company for all requested wire centers except Schuyler, holding the latter wire center aside until the Commission completes its review of two Alabama proceedings which present similar issues.

Finally, Virginia Cellular addressed the argument, frequently made by ILECs, that designation for an area smaller than a rural ILEC's entire study area will result in "cream skimming," or uneconomic targeting of low-cost areas. Specifically, the company emphasized that such concerns are fully neutralized by the ability of rural ILECs to disaggregate and target high-cost support to a more discrete level than the study area. The company explained that, if an ILEC has filed a disaggregation plan that properly apportions per-line support levels **to areas** with correspondingly high or low costs, "cream skimming" concerns will be resolved because a competitive ETC serving only low-cost areas will receive little or no support. The company also emphasized that, if an ILEC's support is not properly targeted and there is a potential for "cream skimming," the Commission's rules permit the modification of an ILEC's disaggregation plan by filing a petition with the state commission.

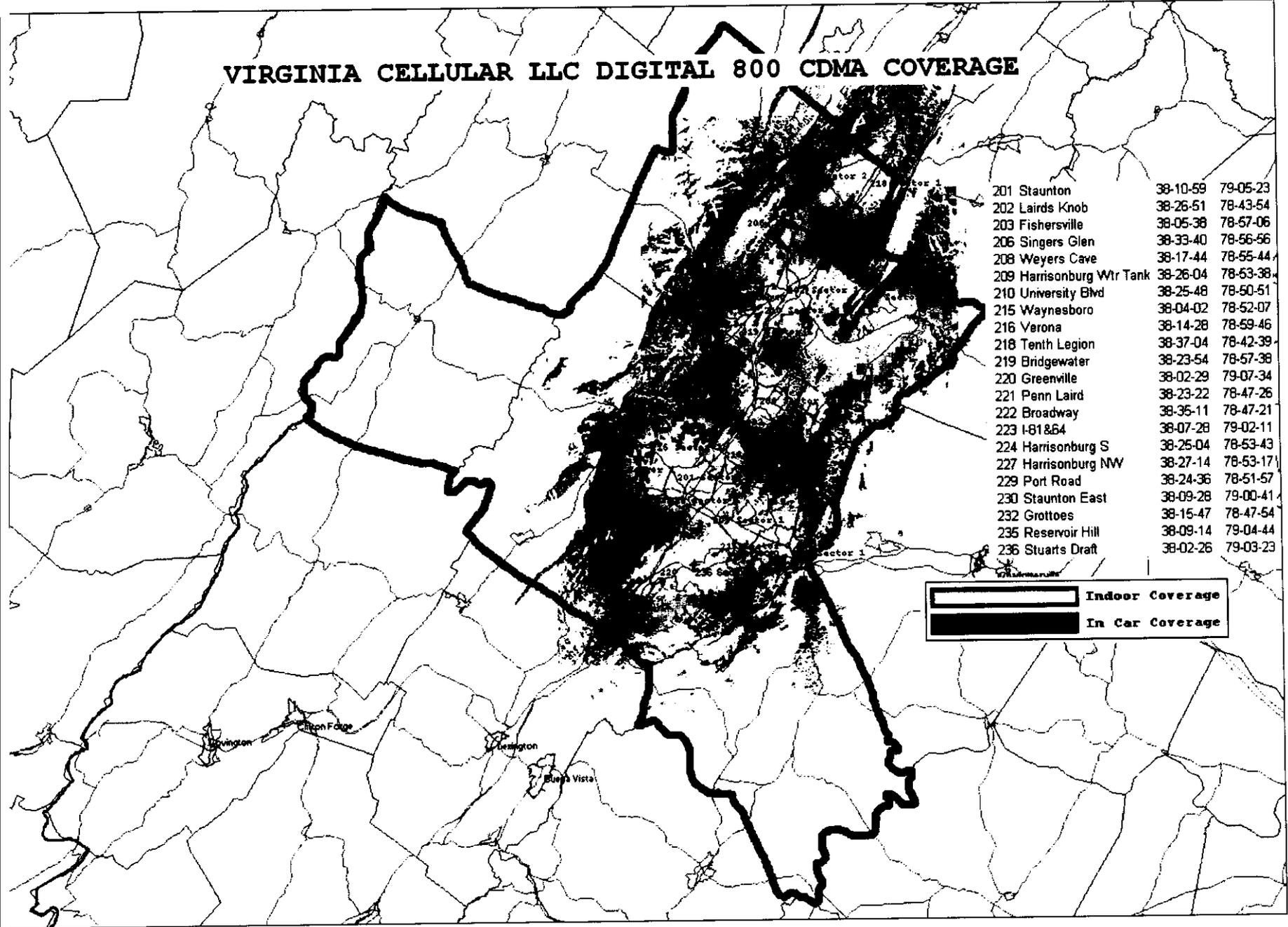
If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,

  
David A. LaFuria  
Steven M. Chernoff

cc: Commissioner Jonathan S. Adelstein (via e-mail)  
Barry Ohlson, Esq. (via e-mail)

# VIRGINIA CELLULAR LLC DIGITAL 800 CDMA COVERAGE



201 Staunton	38-10-59	79-05-23
202 Lairds Knob	38-26-51	78-43-54
203 Fishersville	38-05-38	78-57-06
206 Singers Glen	38-33-40	78-56-56
208 Weyers Cave	38-17-44	78-55-44
209 Harrisonburg Wtr Tank	38-26-04	78-53-38
210 University Blvd	38-25-48	78-50-51
215 Waynesboro	38-04-02	78-52-07
216 Verona	38-14-28	78-59-46
218 Tenth Legion	38-37-04	78-42-39
219 Bridgewater	38-23-54	78-57-38
220 Greenville	38-02-29	79-07-34
221 Penn Laird	38-23-22	78-47-26
222 Broadway	38-35-11	78-47-21
223 I-81&64	38-07-28	79-02-11
224 Harrisonburg S	38-25-04	78-53-43
227 Harrisonburg NW	38-27-14	78-53-17
229 Port Road	38-24-36	78-51-57
230 Staunton East	38-09-28	79-00-41
232 Grottoes	38-15-47	78-47-54
235 Reservoir Hill	38-09-14	79-04-44
236 Stuarts Draft	38-02-26	79-03-23

	Indoor Coverage
	In Car Coverage