

January 19, 2005

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

**Re: National Association of State Utility Consumer Advocates' Petition For
Declaratory Ruling, CG Docket No. 04-208; Truth-in-Billing and Billing
Format, CC Docket No. 98-170
*Notice of Oral Ex Parte Presentation***

Dear Ms. Dortch:

On January 19, 2005, Michael Altschul, Senior Vice President and General Counsel, Andrea Williams, Assistant General Counsel, and Paul Garnett, Director, Regulatory Policy, CTIA – The Wireless Association™, along with Christopher Wright, Harris, Wiltshire & Grannis, met with Austin Schlick, Linda Kinney, David Horowitz, and Andrea Kearney of the Office of General Counsel, and Jay Keithley and Gene Fullano of the Consumer and Governmental Affairs Bureau. At the meeting, CTIA argued that the Commission can and should declare that states may not lawfully regulate CMRS provider line items under the federal pro-competition, deregulatory scheme established in sections 10, 11, and 332 of the Communications Act, 47 U.S.C. §§ 10, 11, and 332. Given the extent of the record in the above-captioned proceedings, CTIA also noted that the Commission does not need to seek additional comment prior to making such a declaration.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Paul W. Garnett

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Cc: Austin Shlick
Linda Kinney
David Horowitz
Andrea Kearney
Jay Keithley
Gene Fullano