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February 2, 2005

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

On February 1, 2005, F.J. Pollak, President and Chief Executive Officer of TracFone Wireless, Inc., Leighton Lang, Assistant General Counsel, TracFone Wireless, Inc., and undersigned counsel for TracFone met with Lisa Gelb, James Lande, Rodger Woock, Cathy Carpino, Rich Lerner, Narda Jones, and Carol Pomponio, all of the Wireline Competition Bureau.

During this meeting, we discussed TracFone's opposition to replacement of a revenues-based universal service contribution methodology with a contribution methodology in which flat charges are imposed on carriers – and ultimately on consumers – based on working telephone numbers or connections to the public switched network. TracFone explained how such a change would not be equitable and non-discriminatory and would not be competitively neutral and how a contribution methodology based on working telephone numbers would disadvantage providers of prepaid wireless telecommunications services (like TracFone) who compete with post-paid providers. More importantly, TracFone explained how a contribution methodology based on working telephone numbers rather than interstate revenues would significantly increase the costs of telecommunications service to low volume, low income users.

In response to assertions made by members of the Wireline Competition Bureau that interstate revenues were continuing to decline, we noted that in prior filings, TracFone had entered into the record of these proceedings data compiled by the Telecommunications Industries Association which

project increases in total interstate revenues each year through 2006. A copy of that TIA data is enclosed herewith. That TIA data seems to be consistent with the increase in projected interstate revenues reported by the Commission between fourth quarter 2004 and first quarter 2005

Finally, we described the general provisions of a "hybrid" contribution methodology which would include components of a revenues-based system and a working telephone numbers-based system. Under the plan described by TracFone, the universal service fund would continue to be funded by revenues-based carrier assessments. However, the amount recoverable though revenues-based assessments would be capped at a specified contribution factor (*e.g.*, between 12% and 15%). Any additional moneys needed to fund the programs supported by the universal service fund would be generated through working telephone number-based assessments on those interstate telecommunications carriers who assign working telephone numbers to customers as part of their provision of service. While this plan would somewhat increase the amount of universal service funding raised from low volume users of interstate service irrespective of the amounts of those customers' interstate usage, the amount of additional funding from those users would be significantly less than would be the case under a contribution methodology based solely on working telephone numbers.

Pursuant to Section 1.1206(b) of the Commission's Rules, this notice is being filed electronically in the above-captioned dockets. If you have any questions regarding this matter, please fee free to contact undersigned counsel for TracFone.

Sincerely,

Mitchell F. Brecher

Enclosure

cc: Ms. Lisa Gelb
Mr. James Lande
Mr. Rodger Woock
Ms. Cathy Carpino
Mr. Richard Lerner
Ms. Narda Jones
Ms. Carol Pomponio

Telecom Revenue Summary - TIA's 2003 Telecommunications Market Review and Forecast

($ in Millions)		1999	2000	2001	2002	2003	2004	2005	2006
Local Exchange Revenue		109,016	118,795	125,916	133,350	141,100	149,000	157,000	165,000
	y-o-y increase		9%	6%	6%	6%	6%	5%	5%
Toll Services		104,169	109,615	107,400	105,700	107,500	110,000	113,000	116,600
	y-o-y increase		5%	-2%	-2%	2%	2%	3%	3%
Wireless Services		46,055	61,702	74,535	86,302	96,681	107,781	119,289	130,164
	y-o-y increase		34%	21%	16%	12%	11%	11%	9%
Wireless LD (assumes 25%)						24,170	26,945	29,822	32,541
	y-o-y increase						11%	11%	9%
Toll & Wireless LD (combined)*						**131,670**	**136,945**	**142,822**	**149,141**
	y-o-y increase						**4%**	**4%**	**4%**

Wireless USF contribution with a 9% factor	2,175	2,425	2,684	2,929
Wireless USF (33.3% ld with a 9% factor)	2,898	3,230	3,575	3,901
Potential additional funding from wireless (millions)	722	805	891	972

**** Current USF Funding base***

Note: Wireless LD % asumes that approximately 25% of wireless revenue is considered LD.