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April 28, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

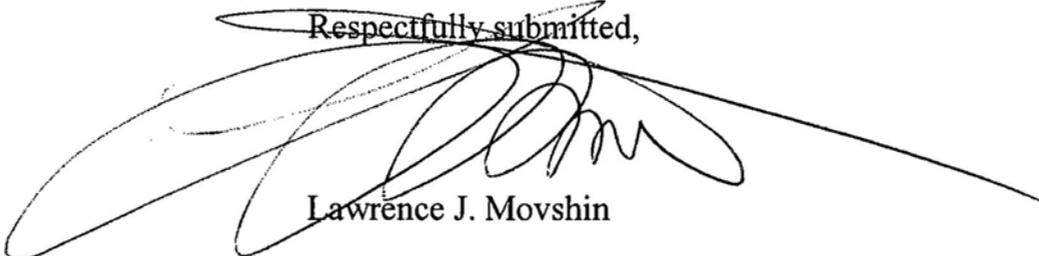
Re: Ex Parte Presentation, WT Docket Nos. 02-381, 01-14, 03-202

Dear Ms. Dortch:

On behalf of Dobson Communications Corporation, pursuant to section 1.1206(b), 47 C.F.R. § 1.1206(b), the undersigned hereby submits the attached letter into the above-referenced dockets.

Kindly refer any questions or correspondence in this matter to the undersigned.

Respectfully submitted,



Lawrence J. Movshin

Enclosure

cc: Barry Ohlson



DOBSON
COMMUNICATIONS
CORPORATION

April 26, 2005

Everett R. Dobson
CHAIRMAN OF THE BOARD

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Adelstein:

It was a pleasure meeting with you once again during the CTIA convention. I appreciate the opportunity we have had over the years to visit with you and update you on the latest developments in the markets we serve, particularly since we share your strong commitment to the provision of high quality wireless telecommunications services in rural areas. As you know, Dobson Communications Corporation ("DCC") is, at heart, a rural telecommunications company, and my family and DCC have always been committed to providing rural consumers with the same service offerings that their urban counterparts benefit from. To that end, DCC continues to roll-out new wireless technologies to meet our customers' demands in rural communities across 16 states, from Alaska to New York. I am delighted that the Commission has members like you who are also deeply interested in fostering wireless services in rural areas across the nation.

As I noted during our meeting, I believe that the goals we share can best be achieved if the Commission embraces a regulatory environment that encourages marketplace forces to drive efficient rural deployments. To that end, Dobson applauds the Commission's recent actions to encourage secondary market spectrum leasing. Based on our successful employment of leasing arrangements over the past several months, we firmly believe that spectrum leasing creates the appropriate economic incentives for parties to make available and gain access to spectrum under fair and reasonable commercial arrangements. These incentives create exactly the kind of market-oriented opportunities that will promote deployment of all types of wireless services in rural America.

I would like to take this opportunity to clarify the company's position on the "keep what you use" proposal for CMRS licenses that is currently pending before the Commission, and which we briefly discussed at CTIA. I have always contended that it makes good business sense to build out networks that reach where our customers (and potential customers) live – and extending DCC networks to sparsely populated communities is an integral part of

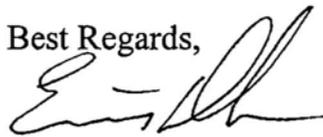
our business strategy. As I indicated during our meeting, we share the concern that entities should not speculate in licenses or warehouse spectrum for anti-competitive purposes. By the same token, there are legitimate economic reasons why some licensed areas may not be built out during an initial ten-year license term, and a policy of spectrum take-backs in such situations would not serve the long-term interests of rural America.

As Dobson previously observed – and the Commission has acknowledged – effective wireless competition generally exists in the nation’s rural markets today, even where the spectrum in every available license is not being fully utilized. Given the lower population densities in many rural areas, the Commission must recognize that the economics of a given area may not support more than two or three facilities-based providers of the types of wireless service offerings we provide today. Application of a spectrum take-back policy in such circumstances will not change these marketplace economics; such a policy may, however, lead to uneconomic *current* construction of network facilities by licensees with legitimate *future* build-out interests, just to “save the license” now rather than deploying facilities according to sound and timely business practices. Instead of creating viable new competition for rural consumers, such forced construction threatens to create market failure in these rural areas by introducing uneconomic competition into the marketplace. Moreover, requiring licensees to allocate scarce capital and other resources to avoid a spectrum take-back necessarily detracts from their ability to satisfy consumer demands in other parts of their license areas. As a result, neither rural consumers nor consumers generally would obtain real benefits, a step backwards for the CMRS industry.

I thank you again for your commitment to rural wireless issues and hope that this letter helps to clarify DCC’s position on the “keep what you use” proposal – as well as its strong endorsement of the Commission’s secondary markets initiative.

I look forward to our next opportunity to meet to discuss issues of importance to our industry.

Best Regards,



Everett Dobson
Chairman
Dobson Communications Corporation