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May 16, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service
Petitions to Redefine Rural ILEC Service Areas in Colorado, Kansas and Wisconsin
DA Nos. 05-469, 05-464 and 05-468

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral *ex parte* presentation in connection with the above-captioned items.

On Friday, May 13, 2005, undersigned counsel, on behalf of N.E. Colorado Cellular, Inc. ("NECC"), RCC Minnesota, Inc. ("RCC"), and Wisconsin RSA #4 Limited Partnership, Wausau Cellular Telephone Limited Partnership, Nsighttel Wireless, LLC, and Metro Southwest PCS, LLP (the "Cellcom Companies") met with John Branscome, legal advisor to Commissioner Abernathy, to discuss the pending petitions for FCC concurrence with the redefinition of rural ILEC service areas in Colorado, Kansas and Wisconsin.[1] A copy of the materials distributed at the meeting is attached hereto.

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[1] Public Notice, *The Wireline Competition Bureau Seeks Comment on Petition to Redefine a Rural Telephone Company Service Area in the State of Colorado,* DA 05-469 (rel. Feb. 22, 2005); Public Notice, *The Wireline Competition Bureau Seeks Comment on Petition to Redefine a Rural Telephone Company Service Area in the State of Kansas,* DA 05-464 (rel. Feb. 22, 2005); Public Notice, *The Wireline Competition Bureau Seeks Comment on Petition to Redefine a Rural Telephone Company Service Area in the State of Wisconsin,* DA 05-468 (rel. Feb. 22, 2005).

Undersigned counsel emphasized that the above-referenced petitions were filed prior to the release of the March 17, 2005, *Report and Order*[2] and therefore should be treated the same as the group of petitions for service area redefinition with which the FCC summarily granted its concurrence in that Order. Moreover, should the FCC determine that these petitions fall under new standards, counsel explained how each of the petitions meets the new standards for redefinition that were developed in *Virginia Cellular* and *Highland Cellular* and reaffirmed in the *Report and Order*. Accordingly, counsel stated that the FCC's concurrence is warranted with respect to each of the three petitions, whether they fall into the summarily granted group or the FCC decides to review them under its new standards, and the FCC should therefore decline to open a proceeding.

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

Sincerely,

/s/

David A. LaFuria
Steven M. Chernoff

Enclosures

cc: John Branscome, Esq.

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[2] *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 05-46 (rel. March 17, 2005).