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June 24, 2005

EX PARTE

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

Re: WT Docket 05-63

Dear Ms. Dortch:

Herewith transmitted, on behalf of Telephone and Data Systems, Inc. ("TDS"), is a letter from Joseph Hanley, TDS Vice President – Technology Planning and Services, regarding the impact of the proposed merger between Nextel Communications, Inc. and Sprint Corporation on the provision of broadband fixed wireless service by innovative service providers such as TDS' subsidiary TDS Metrocom, in the 2.5 GHz frequency band.

Pursuant to Section 1.1206 (b)(1) of the FCC's Rules, the attached letter is being filed electronically. Should there be any questions concerning this filing, please contact the undersigned.

Sincerely,



Peter M. Connolly

cc (w/ encl.): Chairman Kevin J. Martin
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Samuel Feder
John Branscome
Paul Margie
Barry Ohlson
John Schauble
Louis Peraertz

David Krech
Pamela Megna
Jim Bird
Jonathan Levy
Charles Iseman
Erin McGrath
Dennis Johnson
Jeff Tobias
JoAnn Lucanik
Sara Mechanic

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Telephone and Data Systems, Inc.

Excellence in Communications Services

June 24, 2005

EX PARTE

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

RE: WT Docket 05-63

Dear Ms. Dortch,

This letter is filed by Telephone and Data Systems, Inc. ("TDS"), on behalf of its subsidiary TDS Metrocom, Inc. ("TDS Metrocom"), a competitive local exchange carrier, in connection with the proposed merger between Nextel Communications, Inc. and Sprint Corporation. TDS wishes to express its concern regarding the possible impact of the proposed merger on the ability of entrepreneurial providers of telecommunications services, particularly competitive local exchange carriers such as TDS Metrocom, to offer innovative broadband fixed wireless services using 2.5 GHz spectrum. Our concerns are similar to those raised by other parties commenting on the proposed merger in this docket, including the Consumer Federation of America, Consumers Union, Community Technology Centers Network and the National Rural Telecommunications Cooperative.

TDS Metrocom is a facilities-based competitive local exchange carrier, and a part of TDS Telecommunications Corporation ("TDS Telecom"), a local exchange carrier with 1.2 million access line equivalents and operations in 30 states. TDS Telecom is, in turn, a subsidiary of TDS. Operating in Wisconsin, Michigan, Minnesota, and parts of Illinois and the Dakotas, TDS Metrocom serves 440,000 access line equivalents and directly employs over 800 people. The company operates its own switching systems, but is dependent on its competitors, SBC and Qwest, for the loops required to serve most of its customers.

Policy decisions, such as the Triennial Review Order, have limited the ability of CLECs like TDS Metrocom to access RBOC unbundled loops and have substantially increased loop rates in some cases. As the RBOCs build out fiber-based local networks, access to unbundled loops will continue to diminish. TDS Metrocom is thus able to provide DSL to a diminishing percentage of its voice customers.

As a result, TDS Metrocom has been trialing fixed wireless technology, presently as a substitute for DSL-capable loops, but with the eventual goal of provisioning voice services as well. Trials to date have been promising, but have used unlicensed spectrum. Over the long run, we are concerned about the sustainability of a model built on unlicensed spectrum because of the vulnerability to interference that inevitably accompanies such spectrum. We believe that a carrier-grade voice and data offering is likely to require exclusive licensing. It is our view that the 2.5 GHz spectrum is prime spectrum for this purpose. But this spectrum band would be dominated by a merged Sprint-Nextel.

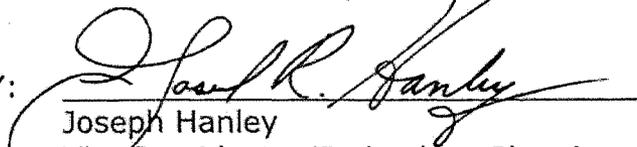
TDS and TDS Metrocom have followed with interest the activities of the WiMax forum and the IEEE's 802.16 standards process. We firmly believe that the market will require systems based on open standards. WiMax clearly seems to be in the best position to fill this role for broadband fixed wireless. We are also following promising work in Korea with the related WiBro standard, which is targeting applications requiring greater mobility. The WiMax forum and its leading members are targeting the 2.3/2.5 GHz bands for licensed WiMax in the U.S. WiBro is using similar spectrum in Korea and, if successfully exported to the U.S. market, can be expected to further underscore the importance of this spectrum. The premier, and potentially dominant, fixed wireless technology is designed to use spectrum that will be, if the merger proceeds without conditions, largely controlled by a single company.

There are other alternatives, but in our view, they each suffer impairments that make them less suitable than 2.5 GHz for this purpose. Some don't enjoy the protection of exclusive licensing (2.4 GHz, 3.6 GHz, 5.8 GHz). Others are prime spectrum for mobile services and are too expensive for fixed applications (850 MHz cellular and 1900 MHz PCS). Still others are constrained by strict out of band emissions restrictions or large license sizes (2.3 GHz WCS). Finally, the 700 MHz band has the overhang of an uncertain UHF television relocation process and may be prime mobile spectrum when that overhang is removed.

It is clear that 2.5 GHz spectrum will be critical to the deployment of voice and data services over broadband fixed wireless --- an alternative access technology that may be essential to the long-term health of CLECs like TDS Metrocom and other entrepreneurial providers of telecommunication services. Unless the Department of Justice and FCC consider merger conditions that make more of this spectrum available to other carriers, a single entity, Sprint-Nextel, will hold a dominant position in this band. This may forever preclude its use by additional companies that could use the spectrum to offer new services and competitive alternatives to consumers and small businesses.

Very truly yours,
TELEPHONE AND DATA SYSTEMS, INC.

BY:


Joseph Hanley
Vice President - Technology Planning and Services