

FISH & RICHARDSON P.C.

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1951

1425 K STREET, N.W.
11TH FLOOR
WASHINGTON, DC 20005

Telephone
202 783-5070

Facsimile
202 783-2331

Web Site
www.fr.com

October 31, 2005

Edwin N. Lavergne
(202) 626-6359
LAVERGNE@FR.COM

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554



BOSTON

DALLAS

DELAWARE

NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

Re: **EX PARTE SUBMISSION**

WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands

Dear Ms. Dortch:

In ex parte submissions made last week, I stated that with the exception of NY3G, *all* commenting parties support the split-the-football solution to the E and F grandfathering issue proposed by WCA, NIA, and CTN. It has come to my attention that Digital Broadcast Corporation, in a one sentence statement included in reply comments filed on February 8, 2005, supported treating grandfathered E and F group EBS stations on a secondary basis. Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this letter is being filed electronically.

Respectfully submitted,

/s/ Edwin N. Lavergne

Edwin N. Lavergne
Counsel
Trans Video Communications, Inc.

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Letter to Marlene H. Dortch

October 31, 2005

Page 2

cc Fred Campbell
 John Branscome
 John Giusti
 Barry Ohlson
 John Schauble
 Cathleen Massey
 Catherine Seidel
 Joel Taubenblatt
 Uzoma Onyeije