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February 3, 2006

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

Re: Ex Parte Presentation
WT Docket No. 99-168/GN Docket No. 01-74

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's ex parte rules, 47 C.F.R. §1.1206, this letter is to notify you that on February 2, 2006 representatives of United States Cellular Corporation ("USCC"), Brad Stein, its Director-External Affairs, Michele Farquhar and the undersigned, met with Barry Ohlson, Legal Advisor to Commissioner Jonathan Adelstein to discuss issues arising in the above-referenced proceeding.

USCC supported proposed revisions to the geographic service area plan for Upper and Lower 700 MHz bands. A copy of its written presentation is attached.

In the event there are questions regarding this matter, please contact the undersigned.

Sincerely,

George Y. Wheeler

cc via e-mail:

Barry.Ohlson@fcc.gov

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U.S. Cellular

Ex Parte Discussion
Upper and Lower 700 MHz Band Plan (01-74/99-168)

February 2, 2006

Getting to Know U.S. Cellular

U.S. Cellular

- **U.S. Cellular, a publicly traded company, is 82% owned by Telephone and Data Systems**
- **U.S. Cellular Fast Facts**
  - Based in Chicago, Illinois
  - Providing cellular service since 1985
  - Serving over 5 million customers in 25 states
  - Employing more than 7,400 associates and supports hundreds of exclusive and non-exclusive agents
  - Operating four domestic call centers
  - Operating a CDMA 1XRTT network with $655 million in network improvements and expansion last year
  - Service Revenues of $2.6 billion in 2005

U.S. Cellular

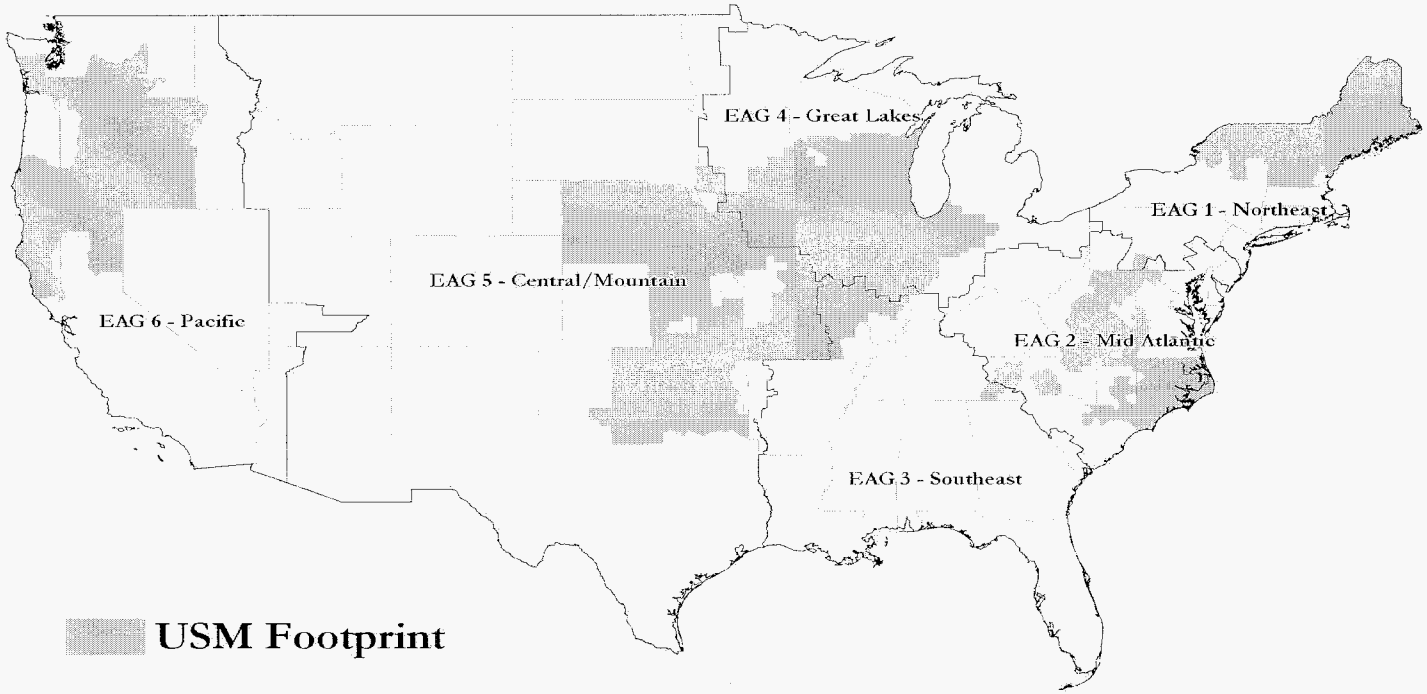
•Setting U.S. Cellular Apart

- Regional provider serving both metro areas and some of the most rural corners of the country
  - Focus on providing the very best in customer satisfaction
  - Industry leading 1.7% all-in churn rate and fewest number of FCC complaints of all carriers (Consumers Union) in 2005
  - Winning new markets and growing existing markets
    - Chicago (2002)
    - Oklahoma City, OK (2004)
    - Lincoln, NE (2004)
    - Portland, ME (2004)
    - St. Louis, MO (2005)

EAGs and U.S. Cellular Licensed Markets

U.S. Cellular

U.S. Cellular with EAGs



Policy Principles for 700 MHz Services

U.S. Cellular

U.S. Cellular supports balanced, accessible, and flexible band plans for future spectrum auctions --- 700 MHz

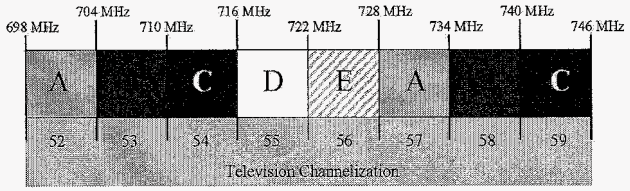
- Spectrum licensed in small geographic sizes. For the 700 MHz auction, at least 22 MHz of additional licensed spectrum using MSAs and RSAs
- Blocks placed within the band plan to allow carriers with a variety of business plans to aggregate spectrum from adjacent blocks
- Use of proven simultaneous, multi-round auctions without package bidding

U.S. Cellular endorses the RCA/RTG positions filed in GN Dkt No. 01-74 and WT Dkt No. 99-168 and could support other alternatives based on the above principles – Attached for reference are copies of RTG proposals for use of additional MSA/RSA licensing in the Upper and Lower 700 MHz bands.

700 MHz Band Plan Proposals

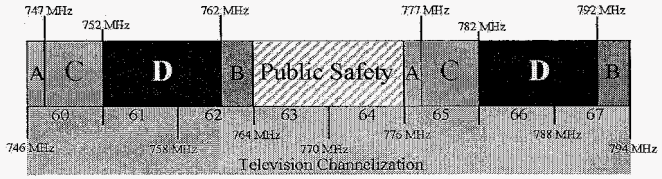
U.S. Cellular

RTG's Proposed Lower 700 MHz Bandplan



Block	Frequencies (MHz)	Bandwidth	Pairing	Geographic Area Type	No. of Licenses
A	698-704, 728-734	12 MHz	2 x 6 MHz	700 MHz EAG	6
B	704-710, 734-740	12 MHz	2 x 6 MHz	MSA/RSA	734
C	710-716, 740-746	12 MHz	2 x 6 MHz	MSA/RSA	734
D	716-722	6 MHz	unpaired	700 MHz EAG	6
E	722-728	6 MHz	unpaired	700 MHz EAG	6

RTG's Proposed Upper 700 MHz Bandplan



Block	Frequencies (MHz)	Bandwidth	Pairing	Geographic Area Type	No. of Licenses
A (Guard Band)	746-747, 776-777	2 MHz	2 x 1 MHz	Major Economic Areas	52
B (Guard Band)	762-764, 792-794	4 MHz	2 x 2 MHz	Major Economic Areas	52
C	747-752, 777-782	10 MHz	2 x 5 MHz	MSA/RSA	734
D	752-762, 782-792	20 MHz	2 x 10 MHz	700 MHz EAG	6

Accessible License Sizes Are Important for 700 MHz

U.S. Cellular

- Band plans for the upper and lower 700 MHz bands were originally adopted in 2000 and 2001 --- much has changed in the industry
- The entire 60 MHz of spectrum yet to be auctioned is configured on an EAG basis – only six areas for the entire contiguous U.S.
- Congress has approved legislation to set a date certain for the Digital TV transition – auctions commencing on or before January 28, 2008 and February 17, 2009 deadline for the cessation of analog television service.
- The FCC should update its band plans for the upper and lower 700 MHz bands to make them more accessible to regional and smaller wireless carriers

Summary

U.S. Cellular

- U.S. Cellular and other regional and small operators are providing value, quality and choice to American consumers
- Regional and smaller wireless service providers need continued access to spectrum to provide advanced services and meet demands for growth
- Band plans for future spectrum auctions should reflect the principles of balance, accessibility, and flexibility
- The 700 MHz band plan should contain at least 22 MHz of additional local spectrum licensed areas and should allow for flexible aggregation of spectrum
- U.S. Cellular endorses the RCA and RTG Positions in GN Dkt No. 01-74 and WT Dkt No. 99-168 and would support other alternatives based on these principles
- The FCC should update its band plan for the 700 MHz bands to reflect these principles.