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March 9, 2006

VIA ELECTRONIC FILING

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

Re: *Ex Parte* Communication

GN Docket No. 01-74 – Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)

WT Docket No. 99-168 – Service Rules for the 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules

Dear Madam Secretary:

Rural Cellular Association (“RCA”), through counsel, submits this *ex parte* letter as a supplement to RCA’s “Petition to Institute Review and Modification of the Size of Service Areas for Geographic Licensing for the Lower and Upper Bands of 700 MHz Spectrum Not Yet Auctioned” filed with the Commission on July 29, 2005 (the “RCA Petition”).

RCA has learned of a letter dated February 27, 2006 to Chairman Kevin J. Martin from The Honorable Conrad Burns, United States Senator, Montana (the “Senator’s Letter”). The Senator’s Letter explains the importance of small geographic license areas, specifically Cellular Market Areas (“CMAs”), for the future offering of spectrum in the Lower and Upper 700 MHz bands.

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RCA observes that each point made in the Senator's Letter in support of CMA-sized license areas is fully consistent with the reasoning offered in the RCA Petition for smaller license areas for the 700 MHz spectrum yet to be auctioned. For example, Senator Burns noted:

The excellent propagation features of the 700 MHz spectrum are particularly well-suited for carriers seeking to serve rural areas, however the current large service areas create fundamental problems that can only be addressed by adopting a new band plan with smaller service areas. For example, the current large license areas could result in little or no build-out in rural areas by the few auction winners, who will need to concentrate their resources to build-out service in the major population centers before focusing on smaller cities and rural areas.

RCA members look forward to the opportunity to bring to their rural market customers the high speed broadband and other advanced wireless services that are now being introduced in major U.S. cities. By all indications the 700 MHz spectrum will be ideal for that purpose, and many of RCA's nearly 100 member carriers have indicated they would participate in the auctions if they have a viable opportunity to acquire spectrum according to CMA-sized license areas.

RCA has not yet advocated a specific revision to the current bandplans, recognizing that there are at least several ways to change the current bandplans to achieve the desired result in both the Lower and Upper 700 MHz bands. Instead we ask the Commission to commit to a reexamination of the very large, regional license areas and substitute a licensing plan that will promote buildout of facilities in rural areas, as would be the case with the availability of CMA-sized license areas.

Sincerely,



David L. Nace
Counsel for Rural Cellular Association

cc: Best Copy and Printing, Inc. (by email)