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April 5, 2006

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VIA ELECTRONIC FILING

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

Re: *Implementation of the Commercial Spectrum Enhancement Act and
Modernization of the Commission's Competitive Bidding Rule and
Procedures*, WT Docket No. 05-211.

Dear Ms. Dortch:

This notice is to inform you that on April 3, 2006, John T. Scott, III of Verizon Wireless, and R. Michael Senkowski and the undersigned, of Wiley Rein & Fielding LLP and on behalf of Verizon Wireless, had an *ex parte* meeting with Samuel Feder, General Counsel; Joel Kaufman, Associate General Counsel and Chief, Administrative Law Division; Christopher Killion, Deputy Associate General Counsel, Administrative Law Division; and David Horowitz, Assistant General Counsel, Administrative Law Division.

We discussed potential legal problems associated with adoption of rule, proposed in the Commission's February 3, 2006, further notice of proposed rulemaking in this docket ("FNPRM"), limiting the award of designated entity ("DE") benefits to an otherwise qualified DE if it has a "material relationship" with a large in-region incumbent wireless service provider, and defining "large" as a company with average gross revenues over the preceding three years of \$5 billion or more.

Respectfully submitted,

Helgi C. Walker

cc. Samuel Feder
Joel Kaufman
Christopher Killion
David Horowitz