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June 12, 2006

## VIA ELECTRONIC FILING

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

**Re: Notice of Oral *Ex Parte* Communication  
WT Docket No. 05-265 – Reexamination of Roaming Obligations of  
Commercial Mobile Radio Service Providers**

**WT Docket No. 00-193 – Automatic and Manual Roaming Obligations  
Pertaining to Commercial Mobile Radio Services**

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. Section 1.1206, we hereby provide you with notice of an oral *ex parte* presentation in connection with the above-captioned proceedings. The meeting occurred on June 9, 2006 with Commissioner Jonathan S. Adelstein and Barry J. Ohlson, Senior Legal Advisor. The meeting was attended by the undersigned and Arthur L. Prest of Prest & Associates, on behalf of the Rural Cellular Association ("RCA").

RCA members, which are much smaller in size than the national and large regional wireless carriers, have encountered difficulties in negotiating automatic data roaming agreements with the larger wireless carriers. RCA believes that a good faith negotiation obligation on all CMRS carriers would be an appropriate first step toward bringing the benefits of compatible networks to consumers in rural areas.

RCA urges the Commission to adopt rules that impose good faith, reciprocal bargaining obligations upon CMRS carriers such that voice, data and other wireless services will be

June 12, 2006  
Page 2

available automatically, where the networks are compatible and roaming between carriers is technologically feasible. RCA recommends adoption of good faith bargaining standards that mirror those set forth in the *Satellite Home Viewer Improvement Act of 1999*. In the event of perceived violations of the good faith negotiation standard, CMRS providers would be subject to the Commission's common carrier complaint processes.

Reference was made to RCA's Comments filed November 28, 2005 in response to the Commission's "Memorandum Opinion and Order and Notice of Proposed Rulemaking" (FCC 05-160) released August 31, 2005 in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Nace", written in a cursive style.

David L. Nace  
Counsel for Rural Cellular Association

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