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June 13, 2006

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WT Docket 05-211; Annual Report for Personal Communications Services Licenses WQCX667, WQCZ668, WQCZ669, WQCZ670, WQCZ671, WQCZ672, WQCZ673, WQCZ674, WQCZ675, WQCZ676, WQCZ677, WQCZ678, WQCZ679, WQCZ680, WQCZ681, WQCZ682, WQCZ683, WQCZ684, WQCZ685, WQCZ686, WQCZ687, WQCZ688, WQCZ689, WQCZ690, WQCZ691, WQCZ692, WQCZ693, WQCZ694, WQCZ695, WQCZ696, WQCZ697, WQCZ698, WQCZ699, WQCZ700, WQCZ701, and WQCZ702

Dear Ms. Dortch:

On April 25, 2006, the Commission adopted new rules applicable to certain designated entity licenses.¹ Paragraph 47 of the *Order* includes a requirement that licensees that hold designated entity licenses file an annual report with the Commission regarding agreements to which the licensee is a party that may affect the designated entity eligibility of those licenses. In the Commission's subsequent reconsideration of certain issues in the *Order*, no change was made with respect to these annual reporting requirements.

Cook Inlet Region, Inc. ("Cook Inlet") is the parent company of Cook Inlet VS/GSM VII PCS, LLC (the "Licensee"), the licensee of the above-referenced designated entity licenses. Those licenses were originally awarded on June 20, 2005. However, other petitions for reconsideration of the *Order* have been filed with the Commission. Cook Inlet has sought

¹ See Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission's Competitive Bidding Rules and Procedures, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, 21 FCC Rcd 4753 (2006) (the "*Order*").

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clarification and confirmation from the Commission staff as to whether these new annual reporting requirements apply to the above-referenced licenses in light of the fact that the *Order* is not yet final. In addition, no mechanism currently exists on the Commission's electronic filing system for delivering annual license reports. Cook Inlet has not yet received any such confirmation. Therefore, in an abundance of caution, Cook Inlet, on behalf of the Licensee, hereby submits this letter in order to comply with the requirements of these new rules.

As of the date of this letter, the Licensee is a party to those agreements described in its long form application filed with the Commission in connection with Auction 58:

- a Technical Services Agreement, by and between the Licensee and T-Mobile USA, Inc., dated as of November 29, 2005;
- a System and Switch Lease Agreement, by and between the Licensee and T-Mobile USA, Inc., dated as of November 29, 2005; and
- a Wholesale Agreement, by and between the Licensee and T-Mobile USA, Inc., dated as of November 29, 2005.

Copies of these agreements have been provided to Commission staff on a confidential basis. No change or amendment has been made to these agreements since those copies were provided.

In addition, the other agreements reflected in the Licensee's long form application filed with the Commission in connection with Auction 58 remain in place, including the limited liability company operating agreement of the Licensee, the limited liability company operating agreement of the Licensee's parent company (Cook Inlet VS/GSM VII PCS Holdings, LLC), and the exchange rights agreement between Cook Inlet Voice and Data Services, Inc. (a subsidiary of Cook Inlet), T-Mobile USA, Inc. and Deutsche Telecom, remain in place. Copies of these agreements have been provided to Commission staff on a confidential basis. No change or amendment has been made to these agreements since those copies were provided.

There are no other agreements to which the Licensee is a party or that may impact the eligibility of the above-referenced licenses as designated entity licenses.

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As always, please feel free to contact the undersigned if there are any questions about this letter or if you need any additional information.

Respectfully submitted,

/s/ Christine E. Enemark

Counsel for

Cook Inlet Region, Inc.

cc: Erin McGrath (by email)
Jim Schlichting (by email)