

June 21, 2006

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Reexamination of Roaming Obligations of Commercial Mobile Radio
Service Providers (WT Docket No. 05-265)**

**Implementation of the Commercial Spectrum Enhancement Act and
Modernization of the Commission's Competitive Bidding Rules and
Procedures (WT 05-211)**

Dear Ms. Dortch:

On Tuesday, June 20, 2006, Jim Schlichting, Deputy Chief of the Commission's Wireless Telecommunications Bureau, visited the offices of the National Telecommunications Cooperative Association (NTCA) in Arlington, VA. Mr. Schlichting met with members of NTCA's Industry and Government Affairs Committees.

During the meeting, committee members discussed open proceedings that are affecting or will affect their wireless operations. Specifically, the group discussed NTCA's Petition for Reconsideration of the Commission's Report and Order in WT 05-211. Committee members explained that they must form bidding consortiums to compete for spectrum at auction. The Commission's current rules force carriers to either form a new entity that may have to repay the bidding credits or divide the spectrum at the auction's end. Committee members described how the rules deprive them of the economic advantages of joint operation and make it difficult for them to offer a service that is competitive with larger carriers.

Committee members also discussed roaming issues and the difficulties they face in negotiating agreements with larger carriers. Members described how larger carriers are not entering into agreements for roaming in markets where they provide service, but that mismatched geographic service territories of large and small carriers is effectively depriving consumers of the ability to roam. The service territories of large carriers are much larger, often totally

encompassing and surrounding the territory of the smaller carriers. If the larger carrier does not allow “in market roaming” and refuses to negotiate roaming agreements with the smaller carrier simply because the smaller carrier serves a portion of the larger carrier’s territory , the customers of the smaller carrier are deprived the ability to roam outside the territory of their home provider. The group encouraged Mr. Schlichting and the Wireless Telecommunications Bureau to adopt automatic roaming requirements that recognize the differences between larger and smaller carriers.

The discussions between the NTCA committee members and Mr. Schlichting were consistent with NTCA’s previous FCC filings on the issues.

In accordance with the Commission’s rules, this letter is being electronically filed with the Secretary’s Office. If you have any questions, please do not hesitate to contact the undersigned at 703-351-2016.

Sincerely,

/s/ Jill Canfield
Jill Canfield
Senior Regulatory Counsel
Legal and Industry