

August 30, 2006

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Ms. Angela E. Giancarlo

Re: *Litchfield County Cellular, Inc. dba Ramcell of Kentucky
Further Supplement to Petition for Waiver of Section 20.19(c)(2) of the
Commission's Rules
WT Docket No. 01-309*

Dear Ms. Dortch:

In this Further Supplement to Petition for Waiver of Section 20.19(c)(2) ("Further Supplement"), Litchfield County Cellular, Inc. dba Ramcell of Kentucky LLC ("LCC") hereby amends its February 17, 2006 supplement to its petition for waiver of Section 20.19(c)(2) of the Commission's Rules applicable to LCC's TDMA cellular system in the Kentucky 11 RSA market ("KY RSA 11").¹ LCC hereby updates the Commission on the progress made by LCC since the filing of the Supplement and seeks an additional six months to finalize the sale of its

¹ See Supplement of Litchfield County Cellular, Inc. dba Ramcell of Kentucky to Petition for Waiver of Section 20.19(c)(2) of the Commission's Rules, WT Docket No. 01-309 (filed Feb. 17, 2006) ("Supplement"); Petition of Litchfield County Cellular, Inc. dba Ramcell of Kentucky LLC for Waiver of Section 20.19(c)(2) of the Commission's Rules, WT Docket No. 01-309 (filed, Sept. 16, 2005) ("Petition").

TDMA system. As discussed in further detail below, LCC has reached an agreement in principle with a large, well-established wireless carrier to purchase LCC's TDMA system.

Section 20.19(c)(2)(i)(A) requires that each provider of public mobile radio services must "[i]nclude in its handset offerings at least two handset models per air interface" by September 16, 2005 that meet the U3 rating of the ANSI C63.19-2001 technical standard.² As the Commission is aware, LCC is a small "Tier III" rural wireless carrier that operates a cellular TDMA network to provide wireless service in sparsely populated, rural counties in Kentucky. LCC originally sought a waiver of Section 20.19(c)(2)(i)(A) and, to the extent necessary, Section 20.19(c)(2)(i)(B) of the Commission's Rules because, among other things, LCC determined that it was not viable from a business standpoint to overbuild its current TDMA air interface system to employ an alternative air interface protocol and, thus, LCC could not avail itself of the transition period for TDMA systems under Section 20.19(c)(2)(i)(B).³ LCC requested a waiver through August 31, 2006 to allow it to list its TDMA system with a broker, and complete the sale of the system.⁴

Since the filing of the Supplement, LCC's telecommunications broker has vetted the availability of LCC's system to wireless carriers throughout the industry. Finding a prospective buyer, however, was made more difficult due to the fact that LCC is a TDMA based system.

Through the joint efforts of LCC and its broker, LCC has secured an agreement in principle to sell its TDMA system to a large, well-established wireless carrier. Significantly, the purchasing carrier has promised to bring the TDMA system into compliance with the

² See 47 C.F.R. §§ 20.19(b)(1), (c)(2)(i).

³ See Petition at 4-5.

⁴ See Supplement at 2.

Commission's hearing aid compatibility and E911 requirements. The buyer is currently conducting its due diligence review in anticipation of purchasing LCC's system. Once completed, it is anticipated that a final agreement will be signed and the parties will submit the requisite assignment applications to the FCC. LCC is hopeful that this filing will be made by October 31, 2006. In order to facilitate the necessary Commission approval, LCC must request a further extension of the compliance deadline until February 28, 2007 to permit LCC complete the sale of its system and to obtain the required Commission approval.

LCC has made significant strides in finding a buyer who will be able to meet the Commission's hearing-aid compatibility requirements. The requested extension is in the public interest as it will result in LCC's system meeting the Commission's hearing-aid compatibility requirements while assuring that B Block cellular service will continue uninterrupted in KY RSA 11.

Kindly contact the undersigned should you have any questions in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read "William J. Sill". The signature is fluid and cursive, with a large initial "W" and a long, sweeping underline.

William J. Sill
Nguyen T. Vu

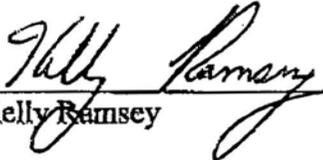
*Counsel for Litchfield County Cellular,
Inc. dba Ramcell of Kentucky*

DECLARATION OF KELLY RAMSEY

I, Kelly Ramsey, declare under penalty of perjury that the following is true and correct:

1. I am the General Manager of Litchfield County Cellular, Inc. d/b/a Ramcell of Kentucky, LLC ("Litchfield").
2. I have reviewed the foregoing Further Supplement to Petition for Waiver of Section 20.19(c)(2) of the Commission's Rules and believe it to be true and correct to the best of my knowledge, information and belief.

This Declaration is executed this 30 day of August, 2006.



Kelly Ramsey