

January 5, 2007

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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby, TW-A325  
Washington, DC 20554

**Re: *Ex Parte Presentation*, Advanced Wireless Services Cost-Sharing Clearinghouse, WT Docket No. 02-353, ET Docket No. 00-258; FCC Public Notice DA 06-1984.**

Dear Ms. Dortch:

On January 4, 2007, Brian Josef, Director, Regulatory Affairs, CTIA – The Wireless Association®, spoke by telephone with Joel Taubenblatt, Chief of the Broadband Division of the FCC’s Wireless Telecommunications Bureau, regarding the exchange of information between cost-sharing clearinghouses that may be necessary for the administration of clearinghouse functions.

During the call, Mr. Josef addressed PCIA’s December 21<sup>st</sup> and December 29, 2006 *ex parte* notices, which appear to mischaracterize certain aspects of CTIA’s proposed approach. Mr. Josef explained that CTIA’s proposal in no way prevents a participant from entering into a contract with a particular clearinghouse until payment of any reimbursement obligations that it may owe, as PCIA suggests.<sup>1</sup> There exists no impediment to a party receiving access to assistance in advance of transferring link registration data. CTIA’s approach merely addresses a party’s ability to transfer link registration data from one clearinghouse to another once that party has obtained future cost-sharing rights, *i.e.*, after it has satisfied its reimbursement obligations in full.

<sup>1</sup> See PCIA *Ex Parte* Notice, WT Docket No. 02-353, ET Docket No. 00-258, dated Dec. 21, 2006 (“... a participant would be barred from selecting a clearinghouse until it has paid all of its reimbursement obligations.”); PCIA *Ex Parte* Notice, WT Docket No. 02-353, ET Docket No. 00-258, dated Dec. 29, 2006 (“PCIA disagrees with CTIA’s proposal to allow a participant to elect a clearinghouse only after it has cleared certain hurdles.”).

Mr. Josef also emphasized that CTIA's approach is consistent with the FCC's directive that a clearinghouse serve as a neutral administrator of the cost-sharing process<sup>2</sup> and may not advocate for or against participants in the cost-sharing process.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

*/s/ Brian M. Josef*

Brian M. Josef

cc: Joel Taubenblatt

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<sup>2</sup> See Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Service to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems, ET Docket No. 00-258, Service Rules for Advances Wireless Services in the 1.7 GHz and 2.1 GHz Bands, WT Docket No. 02-353, *Ninth Report and Order and Order*, 21 FCC Rcd 4473 at ¶ 107 (2006) (*recon. pending*).