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February 6, 2007

Via Electronic Filing

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

**Re: Ex Parte Notice
WT Docket No. 06-150; CC Docket No. 94-102; WT Docket No. 01-309;**

Dear Ms. Dortch:

On February 5, 2007, the undersigned and Mr. Charles Townsend, both representing Aloha Partners, L.P. ("Aloha"), met with Angela Giancarlo of Commissioner McDowell's office and discussed matters in the referenced proceeding.

The Commission was urged to act promptly to revise its rules so as to include smaller market sizes in the upcoming 700 MHz auction as well as larger market sizes. The inclusion of smaller market sizes was explained to be necessary to permit small businesses to provide new wireless services to rural areas. The Commission was also urged to maintain the current auction schedule. The enclosed material was also transmitted at the meeting.

Pursuant to 47 C.F.R. § 1.1206(b)(2), this notice is being submitted electronically in the above-referenced docket. In addition, one copy of this notice is being transmitted via e-mail to Ms. Giancarlo.

Very truly yours,

/s/ Thomas Gutierrez
Counsel for Aloha Partners, L.P.

cc: Angela Giancarlo, Esq.

700 MHz Auction Estimated Price Per Market

<u>EAG</u>	<u>Pops</u>	<u>MHz</u>	<u>AWS Avg. Price/MHz pop</u>
Northeast	44 MM	12 MHz	\$280 million
Mid Atlantic	47 MM	12 MHz	\$300 million
Southeast	52 MM	12 MHz	\$330 million
Great Lakes	45 MM	12 MHz	\$290 million
Central	49 MM	12 MHz	\$310 million
Pacific	<u>49 MM</u>	<u>12 MHz</u>	<u>\$310 million</u>
Average	285 MM	12 MHz	\$300 million

- Minimum winning bid likely to be over \$300 million for a single market

AWS Auction Results

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	<u>Bidder</u>	<u># Markets</u>	<u>Dollars</u>
1	T-Mobile	120	\$4.2 B
2	Verizon	13	2.8 B
3	Cable Cos	137	2.4 B
4	Metro PCS	8	1.4 B
5	Cingular	48	1.3 B
6	<u>Leap</u>	<u>100</u>	<u>1.0 B</u>
	Sub Total	426	\$13.1 B
7	U.S. Cellular	17	\$100 MM
8	Nextwave	154	100 MM
9	Atlantic	15	100 MM
10	American	<u>85</u>	<u>100 MM</u>
	Sub Total	271	400 MM
	Grand Total	1122	13.7 B

- If only EAs are auctioned, minimum winning bid is estimated to be \$300 million.
- Only 6 very large companies can afford to pay \$300 million.
- No small companies or DEs would purchase any markets

Estimated 700 MHz Auction Timetable

- Auction Public Notice May 1st
- Auction Final Rules May 15th

Only 45 Days To Raise Money...need 6 months

- Auction applications due July 1st
- Upfront payment due August 1st
- Auction begins September 1st

Accelerating Auction will potentially eliminate 25% of bidders

AWS Auction Took Less Than 4 Months To Get 90% of Proceeds

August 9, 2006	AWS auction begins
September 18, 2006	AWS auction ends (40 days)
November 29, 2006	FCC grants licenses for \$12.2 Billion (90%) in (111 days)

-If 700 MHz auction begins 1/28/08, 111 days = May 18 (45 days
ahead of deadline)

-There is no need to accelerate this auction!!!!!!!