

February 20, 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 Communication; WC Docket Nos. 05-337, 05-271 and 04-36;***  
CC ***Docket Nos. 96-45 and 02-33***

Dear Ms. Dortch:

On February 16, 2007, Christopher Guttman-McCabe, Vice-President, Regulatory Affairs, Paul Garnett, Assistant Vice-President, Regulatory Affairs, and Brian Josef, Director, Regulatory Affairs, CTIA-The Wireless Association®, met with Ian Dillner, Legal Advisor to Commissioner Deborah Taylor Tate, to discuss proposed reforms to the high-cost universal service mechanisms and the classification of wireless broadband Internet access.

During the meeting, CTIA explained its support for consumer-oriented universal service reforms that will minimize demand for universal service, while ensuring that support is available to both incumbent and competitive eligible telecommunications carriers (ETCs) on a non-discriminatory basis.

CTIA specifically described its support for competitively-neutral reverse auctions to determine high-cost universal service support amounts. If implemented in a competitively- and technology-neutral manner, reverse auctions hold the potential to drive down the cost of universal service while providing incentives for efficient investment in mobile and other technologies that consumers in high-cost areas clearly desire.<sup>1</sup> CTIA also expressed its continued support for other incremental reforms to the high-cost universal service mechanisms that will encourage and reward efficiency, better target support to high-cost areas, and simplify administration.<sup>2</sup>

<sup>1</sup> As CTIA has noted, there are now considerably more wireless customers than wireline customers. As of the second quarter of 2006, there were 219 million wireless subscribers and 197 million wireline switched access lines. Moreover, the FCC recently reported that in the first half of 2006, the number of mobile wireless high-speed “lines” increased more than 250 percent and accounted for more than 59 percent of all new high-speed lines. See Federal Communications Commission, Industry Analysis and Technology Division, Wireline Competition Bureau, High-Speed Services for Internet Access: Status as of June 30, 2006, at 5 tbl.1 (2007).

<sup>2</sup> See Comments of CTIA – The Wireless Association, CC Docket No. 96-45 (filed Oct. 15, 2004).

In addition, CTIA stated its support for a Declaratory Ruling classifying wireless broadband Internet access as an interstate information service. CTIA noted that such a classification will be necessary to ensure the continued growth in the market for wireless broadband Internet access. Moreover, treating wireless broadband Internet access as an interstate information service will allow it to compete effectively with other technology platforms already granted such relief.

A copy of this letter along with the presentations made at the meeting is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

*/s/ Paul Garnett*

Paul Garnett

Enclosures

cc: Ian Dillner