

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com
WILLIAM J. SILL
202.383.3419
wsillf@wbklaw.com

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May 15, 2007

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

FILED/ACCEPTED

MAY 15 2007

Federal Communications Commission
Office of the Secretary

Re: *WT Docket No.* 01-309
Cellular Phone of Kentucky, Inc. and Litchfield County Cellular, Inc. dba
Ramcell of Kentucky
Petition for Reconsideration filed May 11, 2007 – Original Signature Page
and Declaration

Dear Ms. Dortch:

Attached please find the original signed copies of the signature page and Declaration from the above-referenced Petition for Reconsideration, which was **filed** by hand (in unredacted form) and via ECFS (in redacted form) on May 11, 2007.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:



William J. Sill

Attachments

No. of Copies rec'd
List ABCDE

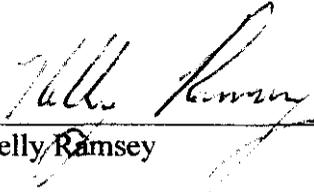
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DECLARATION OF KELLY RAMSEY

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

1. I am the Vice President of Cellular Phone of Kentucky, Inc. and Litchfield County Cellular, Inc. dba Ramcell of Kentucky.
2. I have reviewed the foregoing Petition for Reconsideration and believe it to be true and correct to the best of my knowledge, information and belief.

This Declaration is executed this 11 day of May, 2007.



Kelly Ramsey

with the public interest to permit other rural TDMA carriers to *nor* offer any HAC-compliant handsets *through* September 16, 2006, regardless of how many TDMA models they offered.²⁹

Furthermore, Petitioners never sought authority to operate under a waiver for *an* indefinite period of time. To the contrary, *as* a result of Petitioners' efforts to find a buyer that has the resources to provide HAC handsets to the markets and undertake the required capital intensive build-out, HAC-compliant handsets will be available in the near *future*. In short, while the process admittedly took longer *than* hoped, Petitioners have demonstrated herein a "documented commitment to a date certain for that transition [to CDMA technology] to be accomplished" consistent with the 2005 *Reconsideration Order*.

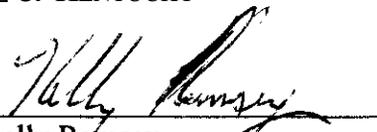
III. CONCLUSION

For the foregoing reasons, the Commission should reconsider its *Order* by granting Petitioners' waiver requests and rescinding the referral of the matter to the Enforcement Bureau.

Respectfully submitted,

CELLULAR PHONE OF KENTUCKY, INC, AND
LITCHFIELD COUNTY CELLULAR, INC. DBA
RAMCELL OF KENTUCKY

By:


Kelly Ramsey
Vice President of Cellular Phone of
Kentucky, Inc. and Litchfield County
Cellular, Inc. dba Ramcell of
Kentucky
6915 Harrodsburg Road
Nicholasville, KY 40356

May 11, 2007

²⁹ The Commission found that the provision for TDMA networks "amounts to an exception and maintains the status quo for affected entities" *Id* at ¶ 73 (in Final Regulatory Flexibility Certification). Petitioners' customers would be in exactly the same position *as a* TDMA carrier who in good faith availed itself of the relief afforded in the *Reconsideration Order* but ceased its overbuild once its total handset offerings dropped to two models.