

June 12, 2007

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

Re: ***Ex Parte Communication***
PS Docket No. 06-229; WT Docket Nos. 96-86, 06-150, 06-169

Dear Ms. Dortch:

On behalf of 55 large, medium and small companies and organizations, we respectfully submit this *ex parte* presentation to express our united opposition to adoption of any geographic build-out requirements under consideration in the *700 MHz Service Rules* proceeding.

Less than three years ago, the Commission addressed performance requirements in the *Rural Wireless Order* and rejected the notion of requiring licensees to deploy services where it would be “economically unsustainable.” Yet today, the Commission has put forward a proposal that would impose geographic build-out requirements.

The Commission should not compel licensees to engage in premature, uneconomic, or unsustainable network deployment. It does not serve consumer interests to force multiple licensees to construct networks outside of the competitive pressures of the market. This could have the opposite of the intended effect, actually delaying services to consumers as carriers are forced to return spectrum they otherwise would have developed. Additionally, the interim geographic requirements will likely force companies to choose the last generation technology instead of the next generation technology, as fourth generation technologies are scheduled to become available during the initial interim benchmark years.

The wireless market is capital-intensive, and forced buildout in certain areas will only short-change investment elsewhere in broadband network deployment, improved coverage, or greater capacity.

The Commission should reject the proposal to adopt a performance requirement based on geographic build-out.

Sincerely,

/s/ Christopher Guttman-McCabe

Christopher Guttman-McCabe
CTIA – The Wireless Association®
On behalf of:

Companies:

Alaska Communications Systems
Alltel Wireless
Aloha Partners, L.P.
Blooston Rural Carriers
All West Communications, Inc.
BEK Communications Cooperative
Big Bend Telephone Company
Cannon Valley Communications, Inc.
CC Communications
Chibardun Telephone Cooperative, Inc.
Clear Lake Independent Telephone Company
Command Connect, LLC
Communications 1 Network
Eastern Colorado Wireless, LLC
FMTC Wireless, Inc.
Hancock Rural Telephone Corp. d/b/a Hancock Telecom
Harrisonville Telephone Company
Haviland Telephone Company, Inc.
Heart of Iowa Communications
Interstate Telecommunications Cooperative
Kennebec Telephone Company, Inc.
Ligtel Communications, Inc.
Manti Telephone Company
Mid-Rivers Telephone Cooperative, Inc.
Midstate Communications, Inc.
Nucla-Naturita Telephone Company
Ponderosa Telephone Company
Red River Rural Telephone Association, Inc.
Santel Communications Cooperative
Smithville Telephone Company
South Slope Cooperative Communications Co.
Venture Communications Cooperative
Webster Calhoun Cooperative Telephone Association
Yadkin Valley Telephone Membership Corp.

Corporate Headquarters:

Anchorage, AK
Little Rock, AR
Providence, RI

Kamas, UT
Steele, ND
Alpine, TX
Bricelyn, MT
Fallon, NV
Dallas, WI
Clear Lake, IA
Sulphur, LA
Kanawha, IA
Wiggins, CO
Nora Springs, IA
Maxwell, IN
Waterloo, IA
Haviland, IN
Union, IA
Clear Lake, SD
Kennebec, SD
Ligonier, IN
Manti, UT
Glendive, MT
Kimball, SD
Nucla, CO
O'Neals, CA
Abercrombie, ND
Woonsocket, SD
Ellettsville, IN
North Liberty, IA
Highmore, SD
Gowrie, IA
Yadkinville, NC

Centennial Communications Corp.	Fort Wayne, IN
Cleveland Unlimited, Inc. d/b/a Revol	Independence, OH
Coalition for 4G in America	
Access Spectrum, L.L.C.	Bethesda, MD
The DIRECTV Group, Inc.	Greenwood Village, CO
EchoStar Satellite, L.L.C.	Englewood, CO
Google Inc.	Mountain View, CA
Intel Corporation	Santa Clara, CA
Skype Communications S.A.R.L.	Luxembourg
Yahoo! Inc.	Sunnyvale, CA
Corr Wireless Communications, LLC	Oneonta, AL
CTIA – The Wireless Association®	Washington, DC
East Kentucky Network, LLC d/b/a Appalachian Wireless	Prestonburg, KY
General Communication, Inc.	Anchorage, AK
Leap Wireless International, Inc.	San Diego, CA
MetroPCS Communications, Inc.	Dallas, TX
Nex-Tech Wireless	Hays, KS
SpectrumCo LLC	Washington, DC
T-Mobile USA, Inc.	Bellevue, WA
Triad AWS, Inc.	Burlingame, CA
Union Telephone Company	Mountain View, WY
U.S. Cellular Corporation	Chicago, IL
Verizon Wireless	Basking Ridge, NJ