

June 21, 2007

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

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

Dear Ms. Dortch:

CTIA-The Wireless Association® (“CTIA”) hereby submits the attached White Paper into the record of the above-referenced 700 MHz proceedings. CTIA opposes four specific proposals under consideration by the Commission, namely: geography-based buildout obligations, eligibility restrictions, the Frontline plan, and “open access” proposals. The attached White Paper demonstrates that the proposed restrictions on the 700 MHz auction would likely insulate firms, such as Frontline, from competition that will likely result in a windfall for Frontline to the detriment of consumers’ best interests . CTIA notes its continued commitment to ensuring that the 700 MHz auction happens in a timely manner and its concern that some proposals would undermine that goal.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

/s/ Christopher Guttman-McCabe

Christopher Guttman-McCabe

Attachment