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June 28, 2007

Via Electronic Delivery

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

Re: Notice of *Ex Parte* Presentation

Service Rules for the 698-746, 747-762 and 777-792 MHz Bands
WT Docket No. 06-150

Dear Ms. Dortch:

On June 27, 2007, Caressa Bennet of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group, Inc. ("RTG"), and Barry Ohlson and Renee Crittendon from Commissioner Jonathan S. Adelstein's office discussed the above-referenced proceeding in a conference call.

In the discussion with Mr. Ohlson and Ms. Crittendon, RTG set forth a potential compromise on the Commission's proposed geographic build out requirements suggesting that if the Commission were to adopt a band plan that included CMA licenses in both the Upper and Lower Bands that it would not be necessary to impose stricter geographic build out requirements on any of the licensees in the first ten years of the license period. RTG explained that if smaller companies and rural carriers had an opportunity to acquire spectrum in the auction because it is offered in smaller geographic blocks (*i.e.*, CMAs) then there would be opportunity for rural entities and small companies to acquire the spectrum in their markets of interest. If, however, the Commission were to forego licensing the 700 MHz spectrum in both the Upper and Lower Bands on a CMA basis, then the Commission should place stricter build out requirements on licensees who purchased spectrum offered on an REAG or EA basis (or any geographic license area larger than CMAs). RTG argued that without strict geographic build out requirements, those acquiring larger geographic licenses areas can hold the spectrum in rural areas hostage and there is no incentive to sell or lease the spectrum to rural companies to serve rural America. RTG suggested that the Commission utilize the geographic requirements proposed by the Commission in its NPRM for EAs and REAGs if CMAs are not utilized in both the Upper and Lower

Bands. RTG acknowledged that the 3-year benchmark for covering 25% of the geography in a license area may be overly burdensome for start up companies.

Regardless of the geographic licensing mechanism used, RTG advocated across the board that all licensees lose any geographic area not covered ten years from the time the license is granted and that any unserved area at the end of ten years be available for anyone to apply to serve along the lines of the FCC's existing cellular unserved area rules.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Caressa D. Bennet
Caressa D. Bennet
Counsel for the Rural Telecommunications Group, Inc.

cc: Barry Ohlson
Renee Crittendon