

July 20, 2007

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

Re: *Ex Parte* Communication, PS Docket No. 06-229; WT Docket Nos. 96-86, 06-150, 06-169; RM-11361; WC Docket No. 07-52

Dear Ms. Dortch:

On July 19, 2007, Steve Largent, President and CEO, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”), met with Commissioner Robert McDowell, and Angela Giancarlo, Legal Advisor to the Commissioner, concerning issues included in the above-referenced 700 MHz proceedings. Specifically, CTIA reiterated its opposition to proposals under consideration by the Commission, including geography-based buildout obligations and “open access” proposals.

CTIA also discussed recent comparisons between the United States and European Union wireless industries, dispelling the notion that European consumers enjoy a better wireless experience. Specifically, CTIA highlighted the superior value and choice that American consumers enjoy:

- American wireless consumers pay 66% less per minute of use than *any* country in Europe, and 75% less than the average European consumer.¹
- American consumers average 834 minutes of use per month, more than any European country, and five times more than the average European consumer.²
- The market share of the top two U.S. carriers (51.5%) is lower than all European countries except one (U.K. – 49.6%) and significantly lower than the European average (76.8%).³
- U.S. carriers offer at least 10 handsets that feature integrated Wi-Fi capability.
- There are at least 44 MVNOs American consumers can choose as an alternative to facilities-based carriers. Globally, there are approximately 200 MVNOs.⁴

¹ See Global Wireless Matrix 1Q07, Merrill Lynch, June 15, 2007.

² *Id.*

³ *Id.*

Finally, CTIA notes a recent article in the *Wall Street Journal* highlighting the increased availability of affordable Wi-Fi devices in the commercial wireless market.⁵

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

cc: Commissioner Robert McDowell
Angela Giancarlo

⁴ See Thomas Winter Aabo, *US MOBILE VIRTUAL NETWORK OPERATORS 2007: THE DEFINITIVE GUIDE AND CRITICAL ANALYSIS OF THE US MVNO MARKET*, Mind Commerce (March 2007); *see also*, "The MVNO Directory", available at <http://www.mvnodirectory.com> (June 2007).

⁵ Jessica E. Vascellaro and Amol Sharma, *Cellphones Get Wi-Fi, Adding Network Options*, *WALL ST. J.*, June 27, 2007, at B1.