

Alltel Corporation
701 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004

July 30, 2007

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

Re: **EX PARTE PRESENTATION**
RM No. 11355

Dear Ms. Dortch:

ALLTEL Corporation, by its attorneys pursuant to Section 1.1206 of the Commission's rules,¹ hereby submits this letter in response to the Commission's recent decision to conduct a public outreach campaign regarding the sunset of the analog service requirement next year.² Alltel seeks to remind the Commission that the sunset of the analog service requirement on February 18, 2008 does not mean that all cellular carriers will be discontinuing service on that date. Alltel does not intend to use a "flash cut" approach to turning down its analog network. Rather, the company currently plans to monitor the number of analog-only subscribers and the demand/usage for analog services on a market by market basis and to turn down the analog network accordingly.

In view of Alltel's approach, we believe that any FCC outreach campaign should be informative and measured, but not unduly raise concerns on the part of subscribers that service may be lost on the sunset date. Carriers may have different plans regarding whether, when and where they will turn down their analog network. Further, the Commission has established minimum standards for customer notice with which every cellular carrier must comply. Consequently, Alltel suggests that any FCC outreach programs simply remind consumers that under the FCC's rules, carriers are required to notify analog subscribers well in advance of any analog service discontinuance and that consumers should be alert to any such notice. Further, consumers interested in obtaining analog sunset information should be directed to their carrier's website for additional information.

¹ See 47 C.F.R. § 1.1206.

² See *Sunset of the Cellular Radiotelephone Service Analog Service Requirement and Related Matters*, RM No. 11355, *Memorandum Opinion and Order*, FCC 07-103, ¶¶ 50-51 (rel. June 15, 2007).

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We applaud the FCC for its efforts in providing consumer outreach, and would be pleased to discuss the matter further. If you have any questions concerning this notice, please contact the undersigned.

Respectfully submitted,

/s/ Glenn S. Rabin

Cc: Joyce Jones (via e-mail)