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October 5, 2007

VIA ECFS

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

Re: Ex Parte Presentation
AU Dkt. No. 07-157

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's ex parte rules, 47 C.F.R. §1.1206, this letter is to notify you that on October 4, 2007, representatives of United States Cellular Corporation ("USCC"), Professor Robert J. Weber, J. L. Kellogg Graduate School of Management, Northwestern University, Grant B. Spellmeyer, Director - Regulatory Affairs, United States Cellular Corporation, Brett Tarnutzer and the undersigned, met with Bruce L. Gottlieb, Legal Advisor to Commissioner Michael J. Copps, to discuss issues arising in the above-referenced proceedings as outlined in USCC filings in AU Docket No. 07-157 and in the attached USCC written presentation.

In the event there are questions regarding this matter, please contact the undersigned.

Sincerely,


George Y. Wheeler *PC*

cc via e-mail:

bruce.gottlieb@fcc.gov

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United States Cellular Corporation
Presentation - Auction 73 Procedures
October 4, 2007

1. Under anonymous bidding, smaller and regional bidders will need eligibility information to help them confidently navigate in this new type of auction including:

- aggregate eligibility ratio for each round (the ratio of total bidding units held by all bidders to the total bidding units of all licenses in the auction); and
- each bidder's eligibility and upfront payment prior to the start of the auction.

2. Smaller and regional bidders also will need activity rules, bid increment procedures and minimum opening bid amounts which allow them flexibility to gain experience with the Bureau's new auction procedures and to develop confidence to bid aggressively.

- reduce minimum opening bid amounts, particularly for RSAs.

And most importantly:

- adjust the proposed "smoothing" formula to set the bid increment for licenses using a much lower floor and ceiling and weighting recent bids more than previous bids (a weight factor of greater than .5).

3. In conjunction with the adjustments to the smoothing formula, smaller and regional bidders would be better able to bid up to their final license values if the Bureau allows three acceptable bid amounts per license (the minimum acceptable bid amount and two additional bid amounts) for all CMA and EA license blocks.

4. Getting the proper balance of package bidding procedures to give smaller and regional bidders a fair chance to compete against package bidders is also essential.

- Oppose adoption of scaling up procedures to determine the "current price estimate" for individual REAG licenses; rather base minimum acceptable bids in each round should be based upon the highest previous bids, as it has traditionally done in its SMR auctions;
- clarify whether it intends to permit a winning bidder in "bid reactivation" situations to win licenses which have bidding units in the aggregate which exceed the bidder's eligibility limits;

5. Contingent subsequent auction of licenses for Blocks A, B, C, D, and/or E, should be conducted using the Bureau's standard SMR auction design without package bidding.

6. Certification or other procedures should be adopted so that bidders who do not intend to participate are not held hostage by the FCC's anti-collusion rules throughout the reauction period.

7. The period between the short-form application filing deadline and the commencement of Auction 73 should be diminished to six weeks with a short form filing deadline in mid December.

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