

# COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW WASHINGTON  
WASHINGTON, DC 20004-2401 NEW YORK  
TEL 202.662.6000 SAN FRANCISCO  
FAX 202.662.6291 LONDON  
WWW.COV.COM BRUSSELS

October 29, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Re: Notification of *Ex Parte* Communication  
WT Docket Nos. 96-86, 06-150 and 05-211; PS Docket No. 06-229; AU Docket  
No. 07-157

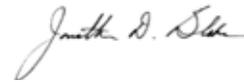
Dear Ms. Dortch:

This letter is to report a permitted, oral *ex parte* communication of Frontline Wireless, LLC (“Frontline”) concerning the above-referenced proceedings.

On October 26, 2007, Janice Obuchowski spoke to Angela Giancarlo, legal advisor to Commissioner Robert McDowell. The parties discussed the Commission’s DE eligibility rules and their application to a wholesaling small business. In particular, they spoke about how the DE rules should be structured, including the limitations on the sale of network services to any one customer and whether there should be any restrictions on financing by such customers.

Please direct any questions concerning this matter to the undersigned.

Sincerely,



Jonathan D. Blake  
*Counsel to Frontline  
Wireless, LLC*

cc: Angela Giancarlo