

October 30, 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, Petition for Declaratory Ruling Filed by CTIA Regarding Whether Early Termination Fees Are “Rates Charged” Within 47 U.S.C. Section 332, WT Docket No. 05-194; Petition for Declaratory Ruling Filed by SunCom, and Opposition and Cross-Petition For Declaratory Ruling Filed by Debora Edwards, Seeking Determination of Whether State Law Claims Regarding Early Termination Fees Are Subject to Preemption Under 47 U.S.C. Section 332(c)(3)(A), WT Docket No. 05-193*

Dear Ms. Dortch:

On Tuesday, October 30, 2007, Christopher Guttman-McCabe, Vice President, Regulatory Affairs and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association® met with Cathy Seidel, Nicole McGinnis, Erica McMahon, and Michael Jacobs, all of the FCC’s Consumer & Governmental Affairs Bureau, to discuss CTIA’s continued support for a determination that wireless carrier early termination fees are rates and/or part of a carrier’s rate structure and therefore are subject to the Commission’s exclusive jurisdiction.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Paul W. Garnett

Paul W. Garnett

cc: Cathy Seidel
Nicole McGinnis
Erica McMahon
Michael Jacobs