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November 8, 2007

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Communications:

**WC Docket No. 05-337 – High Cost Universal Service Support for
Competitive Eligible Telecommunications Carriers (“CETCs”)**

**WT Docket No. 05-265 - Reexamination of Roaming Obligations of
Commercial Mobile Radio Service (“CMRS”) Providers**

WT Docket No. 04-296 – Review of the Emergency Alert System

Dear Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. Section 1.1206, we hereby provide you with notice of oral *ex parte* presentations in connection with the above-captioned proceedings. The presentations occurred on November 7, 2007 in meetings with:

Aaron Goldberger, Ian Dillner, Legal Advisors to Chairman Kevin Martin
Renee Crittendon, Scott Bergmann, Legal Advisors to Comm'r Jonathan Adelstein
Chris Moore and Wayne Leighton, Legal Advisors to Commissioner Deborah Tate

Attending the meeting on behalf of Rural Cellular Association (“RCA”), in addition to the undersigned, were Eric C. Peterson, Executive Director of RCA, and Arthur L. Prest, Technical Consultant to RCA. We discussed positions presented in RCA's comments in each docket and as supplemented below.

Regarding the Universal Service Fund (“USF”) proceeding, there have been recent press reports that indicate the Commission is considering imposing a cap on high cost USF support

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payable to CETCs. RCA opposes a cap on USF support to CETCs. A cap is unnecessary considering the marginal growth in high cost disbursements relative to the overall size of the fund and wireless carriers' contributions to the fund, and it would be counterproductive to the efforts of rural wireless carriers to extend and improve wireless services in rural areas. Further, if applied on a state-by-state basis, CETCs in various states where an insignificant amount of high cost support has been provided as of any arbitrarily selected cut-off date would be impacted in a discriminatory manner.

With reference to the automatic roaming proceeding, RCA representatives reviewed the positions included in RCA's Comments filed on October 29, 2007. RCA asks the Commission to amend the rules to include non-interconnected services among the services for which CMRS carriers are obligated to enter into automatic roaming agreements. Consumers want to use the devices they purchase to access the Internet when traveling outside their home carrier's license area while in the United States.

On the subject of plans for wireless emergency alerts, RCA's representatives commented on the recently submitted report of the Commercial Mobile Service Alert Advisory Committee, of which Art Prest was a member. The Committee was comprised of representatives of the public safety community, equipment and service providers, and wireless carriers who worked for nearly a year to develop and recommend technical standards and protocols for the voluntary transmission of emergency alerts by wireless service providers. Any proposals on technical matters that are submitted in the coming months that vary from the Committee's recommendations should be examined with concern over the practicality of implementation and weighed against the possibility that wireless carriers will opt-out of the emergency alert program because they do not consider certain changes to the recommendations to be technically or economically feasible. RCA plans to participate in the upcoming comment cycle and indicate support for the Committee's recommendations.

Sincerely,

[filed electronically]

David L. Nace

cc: Best Copy and Printing, Inc.
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