



VIA ECFC

May 8, 2008

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

Re: Service Rules for the 698-746, 747-762, and 777-792 MHz bands (WT Docket No. 06-150; 06-169, 96-86, and PS Docket No. 06-229; AU Docket No. 07-157)

Dear Ms. Dortch:

On May 6, 2008 Vanu G. Bose, representing Vanu Coverage Co., and Kathleen Wallman of The Brattle Group met with Derek Poarch, Chief of Public Safety and Homeland Security Bureau; Erika Olsen, Deputy Chief, Public Safety and Homeland Security Bureau; Jeff Cohen, Senior Legal Counsel, Public Safety and Homeland Security Bureau; Renee Crittendon, Legal Advisor for Spectrum and International Issues for Commissioner Adelstein; Wayne Leighton, Special Advisor, Wireless and International Issues for Commissioner Tate; and Bruce Gottlieb, Wireless and International Legal Advisor for Commissioner Copps.

During the meeting, Vanu Coverage Co. described a concept for providing cost-effective coverage for rural areas, using a neutral host network operating in the 700 MHz D-Block spectrum and other frequencies, and introduced the concept of splitting the D-Block into a high population density segment (D1) and a low population density segment (D2), and auctioning each independently. This concept would result in a faster buildout of the proposed combined public safety and commercial network. A number of issues needed to make this feasible were discussed, including:

- the types of roaming arrangements required
- the need for a clearly defined public safety relationship
- the impact of the lower population density on the D2-Block requirements

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically. Please direct any questions regarding this presentation to undersigned counsel for Vanu, Inc.

Respectfully submitted,

/s/Andrew D. Beard

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