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VIA ELECTRONIC FILING

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

Re: *Ex Parte* Notice

High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, WC Docket No. 05-337; Broadband Industry Practices, WC Docket No. 07-52; Amendment of the Commission's Rules Governing Hearing Aid-Compatible Mobile Handsets, WT Docket No. 07-250; Commercial Mobile Alert System (CMAS) Rulemaking, PS Docket No. 07-287; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114

Dear Ms. Dortch:

On Friday, June 27, 2008 representatives of the Telecommunications Industry Association (TIA) met with Commissioner Deborah Taylor Tate and Wayne Leighton, Special Advisor to Commissioner Tate. The TIA representatives were Danielle Coffey, Grant Seiffert and the undersigned. The purpose of the meeting was for TIA to communicate its policy goals for the upcoming year and reiterate its position, consistent with our filings, on the subject matters of Universal Service Fund Reform, network management, and relate its participation in the Telecommunications and Electronic and Information Technology and Information Advisory Committee (TEITAC).

TIA emphasized the importance of transitioning the high-cost portion of the Universal Service Fund to broadband in a technology- and competitively-neutral manner. TIA would like to see support transitioned from narrowband to broadband in a matter of five years. In regard to the network management proceeding, TIA restated its views that it supports the FCC *Internet Policy Statement* and reasonable network practices, so as long as consumers receive meaningful disclosure. TIA provided an update of TEITAC activities. TIA discussed the need to expedite CMAS testing rules prohibiting testing through delivery of messages to cell phone users. Finally, TIA urged the expedition of the D Block auction and recognized LMRS and broadband technologies as necessary elements of an interoperable public safety network.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, a copy of this submission is being provided to Wayne Leighton. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Patrick Sullivan

Patrick Sullivan

cc:
Wayne Leighton



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TIA Issues and Priorities

Hearing Aid Compatibility

- TIA supports the Commission's recent HAC Order and the adoption of the Joint Consensus Plan.
- TIA hopes the FCC will not prematurely regulate newer technologies, such as Wi-Fi and VoIP, and we are currently in the process of extending our HAC standard (TIA 1083) for digital cordless phones to these new technologies.

Universal Service

- TIA supports the proposed Broadband Fund and would like it to be designed so that it is technology and competitively neutral.
- TIA would like to see support transition from narrowband service to broadband over a period of five (5) years, with all technologies competing for funds.

Net Neutrality

- TIA has long supported the Commission's *Internet Policy Statement* as a flexible tool to enhance broadband infrastructure deployment and to facilitate competition.
- Reasonable network management techniques are essential to the consumer's online experience and should be prohibited only in rare cases involving anti-competitive activity.
- TIA supports meaningful disclosure of material terms of service for all customers.

TEITAC:

- Telecommunications and Electronic and Information Technology Advisory Committee (TEITAC) was formed to refresh Section 255, which requires the accessibility of telecom products and services.
- TIA participated on TEITAC for its 2 year duration, ending with a report of recommendations to the U.S. Access Board on April 3, 2008.
- TIA urges the Commission to consider this report – which stemmed from the collaboration of industry, the disability community, and standards organizations – when updating its Section 255 standards.
- TIA would like to see the “readily achievable” standard stay in tact.

Commercial Mobile Alert System

- TIA participated on the Commercial Mobile Service Alert Advisory Committee (CMSAAC), established by the WARN Act, though member Cheryl Blum of Alcatel-Lucent. We support the Commission's resulting Order on this matter, as TIA's main positions were embraced by the Commission.
- With FEMA assuming the Alert Aggregator/Gateway role, TIA encourages the Commission to establish testing parameters that do not include subscriber-based testing. As the CSMAAC noted in its report, such testing will strain network resources and confuse and disturb subscribers.

E911

- TIA supports allowing industry sufficient time and flexibility to develop appropriate location technology solutions to address the critical needs of public safety.
- TIA continues to support a free market and open standards process that will best ensure that consumers receive the most effective E911 capabilities in an expeditious manner, and permitting the continued evolution of such capabilities.
- TIA is assessing position on 911 calls made from Non-Service Initialized (NSI) devices.