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August 14, 2008

VIA ELECTRONIC FILING

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, DC 20054

RE: Examination of Roaming Obligations of Commercial Mobil Radio Service Providers, WT Docket No. 05-265, Ex Parte Filing

Dear Ms. Dortch:

On August 13th and 14th, 2008, Grant Spellmeyer, Director-Regulatory Affairs, of United States Cellular Corporation ("U.S. Cellular") and the undersigned had meetings with Wayne Leighton of Commissioner Tate's Office; Renee Crittendon of Commissioner Edelstein's Office and Aaron Goldberger of Chairman Martin's Office and Brent Greenfield regarding the "home market exclusion" to the automatic roaming requirement adopted in the FCC's Roaming Order.[1] The U.S. Cellular representatives took the positions summarized in the attached one page handout, which was distributed at the meetings. Pursuant to Section 1.1206(b) of the Commission's Rules, an electronic copy of this letter is being filed at the Office of the Secretary. If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

Peter M. Connolly

cc with enclosure: Wayne Leighton
Renee Crittendon
Aaron Goldberger
Brent Greenfield

[1] Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers, 22 FCC Rcd 15817 (Roaming Order).

United States Cellular Corporation
Ex Parte Presentation WT Docket 05-265

U.S. Cellular believes that the public interest would be served by modifying the "home market exclusion" as follows. All carriers would be entitled to roam in markets where they have AWS and 700 MHz licenses for ten years after such licenses are awarded or such spectrum becomes "usable," i.e. "unencumbered," or ten years after the FCC issues its in market roaming order in this proceeding, whichever is latest. Carriers would also be entitled to five years of automatic roaming from the date of the order in markets where they hold cellular or PCS licenses. Further, there would be a "rebuttable presumption" that such roaming arrangements would continue after the initial period had expired.

Data roaming should also be part of the automatic roaming entitlement, subject to a requirement that carriers would only have to undertake reasonable modification to their systems to accommodate data roaming.

Based on its experience as one of the few remaining mid-sized wireless carriers, emphasizing service to rural America, U.S. Cellular believes that an automatic roaming entitlement would not undermine system buildout, or result in spectrum warehousing. Rather, it would promote spectrum acquisition and system expansion by assisting carriers in acquiring a customer base. The in market exception may serve the interests of the largest wireless carriers. But it does not serve the interest of wireless customers, who would benefit from increased service availability, or mid-sized and smaller carriers as reflected in the positions they have taken in this docket.

Moreover, U.S. Cellular believes that the automatic roaming entitlement should be defined in terms of years, rather than system coverage, which would cause endless and unproductive disputes over the extent of coverage and thus where there was a right to roam.