

October 2, 2008

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Communication: WC Docket Nos. 01-92, 04-36, 05-337,  
06-122**

Dear Ms. Dortch:

On Wednesday, October 1, 2008, Christopher Guttman-McCabe, Vice President, Regulatory Affairs and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”), and CTIA’s outside counsel Chuck Keller and Cheryl Tritt, met with Donald Stockdale, Jeremy Marcus, Albert Lewis, Lynne Engledow, Randolph Clarke, Greg Guice, Rebekah Goodheart, Theodore Burmeister, Nicholas Degani, Claude Aiken, Cindy Spiers, Marcus Maher, Alexander Minard, Carol Pomponio, Victoria Goldberg, Matthew Warner, Jay Atkinson and Thomas Buckley, all of the Wireline Competition Bureau and Christopher Killion, Lisa Gelb and Paula Silberthau of the Office of General Counsel and Jane Jackson of the Wireless Telecommunications Bureau on the need for fundamental, consumer-oriented reforms to the universal service and intercarrier compensation systems. Specifically, CTIA detailed its support for: (1) A numbers-based universal service contribution system that does not unfairly treat over 44 million wireless prepaid and over 70 million wireless family-plan customers; (2) Dedicated universal service support for the deployment and maintenance of advanced mobile wireless services in high-cost areas; (3) Changes that will reduce waste under existing high-cost support mechanisms; and (4) Unification of the intercarrier compensation system, with a uniform termination rate of no higher than \$0.0007 per minute, as a transition to a bill-and-keep system. CTIA expressed concerns about a variety of discriminatory and wasteful proposals that, if implemented, would significantly harm consumers by delaying the ubiquitous availability of affordable, next generation wireless and wireline broadband services. These include proposals to eliminate half of all high-cost universal service support for wireless eligible telecommunications carriers (ETCs) (support available from the Interstate Common Line Support and Interstate Access Support mechanisms) without the development and implementation of sufficiently-funded replacement high-cost support mechanisms for wireless ETCs.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter and the presentation used at the meeting are 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: Donald Stockdale  
Jeremy Marcus  
Albert Lewis  
Lynne Engledow  
Randolph Clarke  
Greg Guice  
Rebekah Goodheart  
Theodore Burmeister  
Nicholas Degani  
Claude Aiken  
Cindy Spiers  
Marcus Maher  
Alexander Minard  
Carol Pomponio  
Victoria Goldberg  
Matthew Warner  
Thomas Buckley  
Jay Atkinson  
Jane Jackson  
Christopher Killion  
Paula Silberthau  
Lisa Gelb