

October 15, 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 Tuesday, October 14, 2008, Christopher Guttman-McCabe, Vice President, Regulatory Affairs and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”) met with Amy Bender and Erika Olsen, Legal Advisors to Chairman Kevin J. Martin on the need for fundamental reforms to the universal service and intercarrier compensation systems so that they better reflect consumer choice and the competitive marketplace. 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 high-cost universal service support for wireless eligible telecommunications carriers (ETCs) without the development and implementation of sufficiently-funded replacement high-cost support mechanisms for wireless ETCs. Meanwhile, incumbent LECs would continue receiving support at current levels even though are they losing their customers and minutes at increasing rates each year.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is 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: Amy Bender
Erika Olsen