

October 21, 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 Monday, October 20, 2008, and Tuesday, October 21, 2008, Christopher Guttman-McCabe, Vice President, Regulatory Affairs and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”) met with Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein, and Greg Orlando, Legal Advisor to Commissioner Deborah Taylor Tate 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) 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; (2) Dedicated universal service support for the deployment and maintenance of advanced mobile wireless services in high-cost areas; (3) The establishment of Lifeline and Link Up discounts to enable lower-income individuals to purchase affordable broadband services utilizing the technology of their choice; and (4) 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. CTIA also 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.

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: Scott Bergmann  
Greg Orlando