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October 28, 2008

Via Electronic Comment Filing System
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Letter of Enterprise Wireless Alliance
In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-122;
In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

The Enterprise Wireless Alliance (“EWA”), a broad alliance of business enterprise users, service providers, including paging carriers, and radio dealers and technology manufacturers, pursuant to Section 1.1206 of the Federal Communications Commission rules, hereby submits this *ex parte* letter in response to the October 9, 2008 *ex parte* letter filed by the American Association of Paging Carriers (“AAPC”) in the above-referenced proceedings.

EWA supports the AAPC’s concern that paging carriers, an industry segment that already is challenged by competition from an increasingly concentrated cellular/PCS marketplace, should not also be burdened with an inequitable Universal Service Fund (“USF”) financial obligation. EWA respectfully asks the Commission to closely examine the USF contribution obligation for paging carriers and afford financial parity for this industry. EWA agrees with the AAPC that the Commission should adopt competitively neutral standards for USF contribution obligations, taking into account both the relative average revenue per units (“ARPU”) of paging versus cellular and PCS systems and the fact that paging carriers do not receive USF disbursements to support their services in high cost areas.

Therefore, EWA respectfully requests that the Commission maintain the current system for assessing USF contributions on paging carriers for at least the time being, while it considers the broader issue of possible alternative contribution mechanisms for business users.

Respectfully submitted,
ENTERPRISE WIRELESS ALLIANCE

By: *Mark E. Crosby*
Mark E. Crosby
President

