



21 Dupont Circle, NW  
Suite 700  
Washington, DC 20036

November 25, 2008

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band  
WT Docket No. 07-195**

**Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000  
MHz, 2020-2025 MHz and 2175-2180 MHz Bands  
WT Docket No. 04-356**

***Ex Parte Notice***

On Monday, November 24, 2008, Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) and Jill Canfield of the National Telecommunications Cooperative Association (NTCA) (collectively, the "Associations") met with Renee Crittendon of Commissioner Jonathan Adelstein's office to discuss a reported FCC plan to auction certain Advanced Wireless Services (AWS)-2 and AWS-3 spectrum blocks as a single nationwide license with a requirement that the licensee provide free broadband service. The Associations stated that requiring the AWS-3 band licensee to provide free broadband service would place rural incumbent local exchange carriers' broadband service offerings at a competitive disadvantage and would discourage further investment in rural broadband infrastructure. The Associations asked that the Commission license spectrum in the AWS-2 and AWS-3 bands on the basis of Cellular Market Areas so that rural wireless carriers can realistically compete for it at auction.

Sincerely,

Brian Ford  
Regulatory Counsel  
OPASTCO