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Ex Parte Memorandum

December 5, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Assessment and Collection of Regulatory Fees for
Fiscal Year 2008, MD Docket No. 08-65

Dear Ms. Dortch:

On December 5, 2008, the undersigned, representing the American Association of Paging Carriers (AAPC), met with Roland Helvajian, Mika Savir and Mark Stephens, representing the Office of Managing Director, Financial Operations, concerning the Further Notice of Proposed Rule-making (FNPR) in the above-referenced proceeding to modify the regulatory fee structure. AAPC briefly reviewed the history of regulatory fees applicable to paging units, and described its proposal to allocate the CMRS fee requirement between paging and cellular/PCS units on the basis of their relative monthly Average Revenue Per Unit (ARPU). As stated in AAPC's comments in response to the FNPR, this methodology would have reduced the fee for paging units from \$0.08 per unit to \$0.025 per unit if it had been used in 2008; and it assumes that there are no substantial changes in the revenue requirement allocation between the Commercial Mobile Radio Services and other feeable services. AAPC argued that the cost data on which the relationship was originally established is outmoded due to the substantial deregulation of the paging industry in the meantime, and the more stringent regulation of the cellular/PCS industry in areas such as E-911, wireless local number portability, and others, and that using relative ARPU is the fairest and simplest way to fix the fee relationship between paging and cellular/PCS units in the absence of current and detailed cost allocation information.

Very truly yours,

s/Kenneth E. Hardman

cc: Roland Helvajian
Mika Savir
Mark Stephens