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April 9, 2009

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation
GN Docket No. 09-29
WT Docket No. 06-150

Dear Ms. Dortch:

On April 8, 2009, LEMKO Corporation ("LEMKO") representatives Bohdan Pyskir, President; Brian Ponte, Vice President of Business Development; Veronica Haggart, consultant; and I, outside counsel, met with FCC representatives regarding the above-referenced proceeding. Specifically, we met separately with Commissioner Jonathan Adelstein and his wireless advisor, Renée Crittendon, as well as staff from the Office of Engineering and Technology (Julius Knapp, Alan Stillwell, Ira Keltz, Bruce Romano, Walter Johnston, Karen Ansari, and Rashmi Doshi); Office of Strategic Planning and Policy Analysis (Jon Peha, Chief Technologist); Public Safety and Homeland Security Bureau ("PSHSB") (David Furth, Erika Olsen, Jeff Cohen, and Carol Simpson); and with Wireline Competition Bureau ("WCB") representatives (William Dever, William Kehoe, and Matt Warner) and Wireless Telecommunications Bureau ("WTB") representatives (Christina Clearwater, Charles Mathias, and Gregory Vadas) working on rural broadband deployment issues raised in this proceeding. Steve Schneider, CEO of Hilbert Communications, Inc., also participated by telephone in the meetings with Commissioner Adelstein's office and with the WCB and WTB representatives.

In each of these five meetings, we discussed the issues raised in the attached presentation and two-page overview related to LEMKO's 4th generation core network platform, including the economics of serving unserved and underserved rural areas. In response to a question in the

meeting with WCB and WTB representatives, we also described LEMKO's deployment in otherwise unserved areas in Alaska and Canada, including several First Nation villages. During the meeting with PSHSB representatives, LEMKO responded to a question regarding public safety/D Block benefits by noting the cost efficiencies of serving remote areas with its network architecture, as well as its ability to support any RF technology through its mobile broadband network (including LTE and WiMax).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS with your office.

Respectfully submitted,

/s/ Michele C. Farquhar

Michele C. Farquhar
Counsel to LEMKO

cc: Commissioner Adelstein
Renée Crittendon
Julius Knapp
Alan Stillwell
Ira Keltz
Bruce Romano
Walter Johnston
Karen Ansari
Rashmi Doshi
Jon Peha
David Furth
Erika Olsen
Jeff Cohen
Carol Simpson
William Kehoe
William Dever
Matt Warner
Christina Clearwater
Charles Mathias
Gregory Vadas

Lemko's 4th Generation Rural Mobile Broadband Network Grid

Lemko is a Game Changer

- Company founded in 2005 by a team of former Motorola business and technical leaders.
  - Based in Schaumburg, IL
  - Revenue and cash flow positive
  - Privately held
- Currently delivering 4th generation core network platform :
  - Rural carriers in US and Canada
  - Small market operators internationally
  - Military and government agencies in the US and China.
- Key events
  - Katrina rescue and recovery
  - China FEMA for Hanjin earthquake
  - Interconnection tested and approved by over 20 carriers worldwide
  - Commercial deployments in WI,MI, IA, AK, & WY

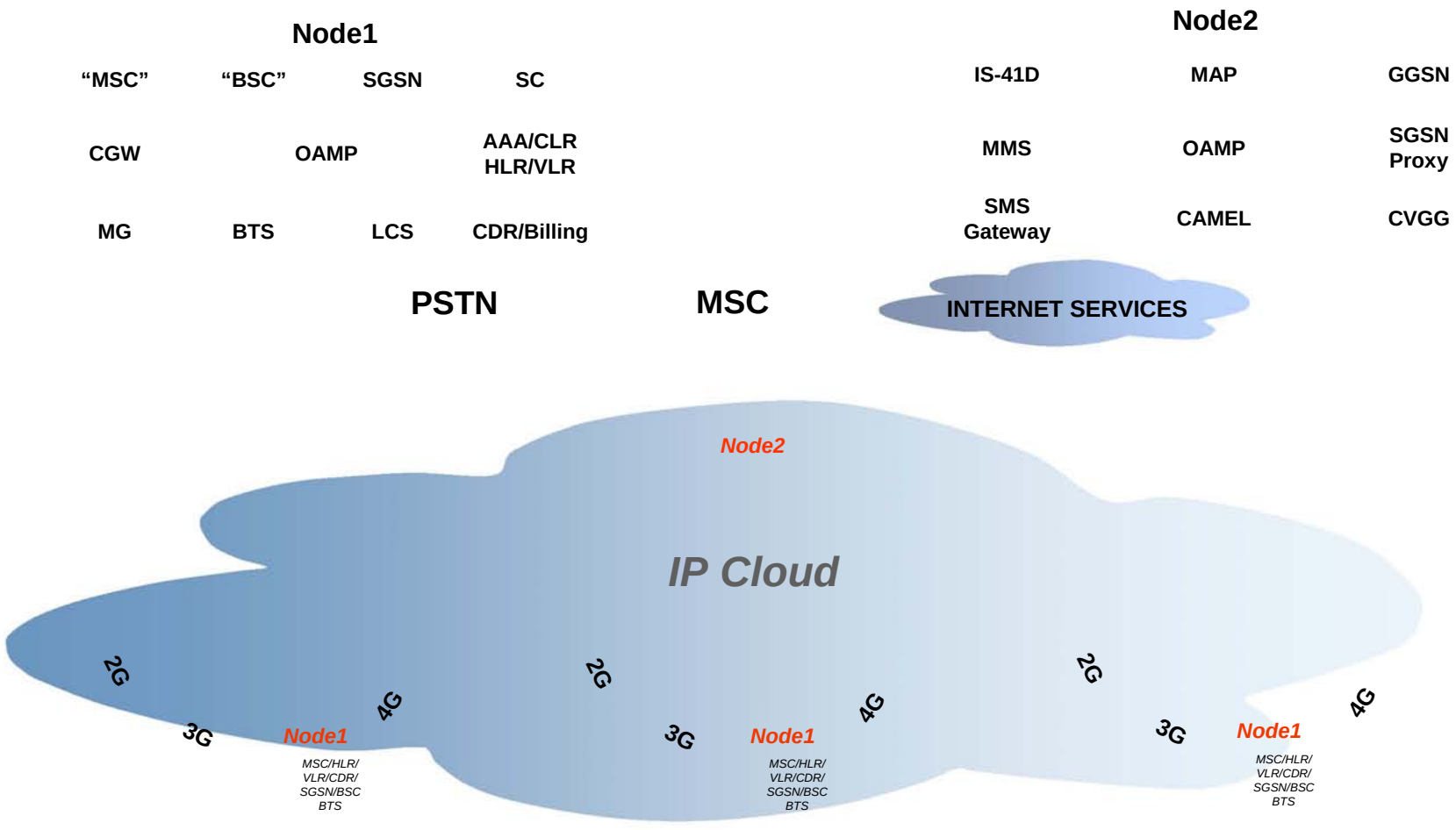
Lemko – Game Changing Network Architecture

- Two Elements to a 4th Generation Mobile Broadband Network
  - Fast radio (LTE/WiMax)
  - Two node, all IP flat network architecture

- Lemko's Node1™
  - Provides all core network functionality at the cell site
  - Node1 sites interconnect as peers on the IP cloud
  - Supports 2.5/3/4G RAN – LTE software upgrade when devices ready

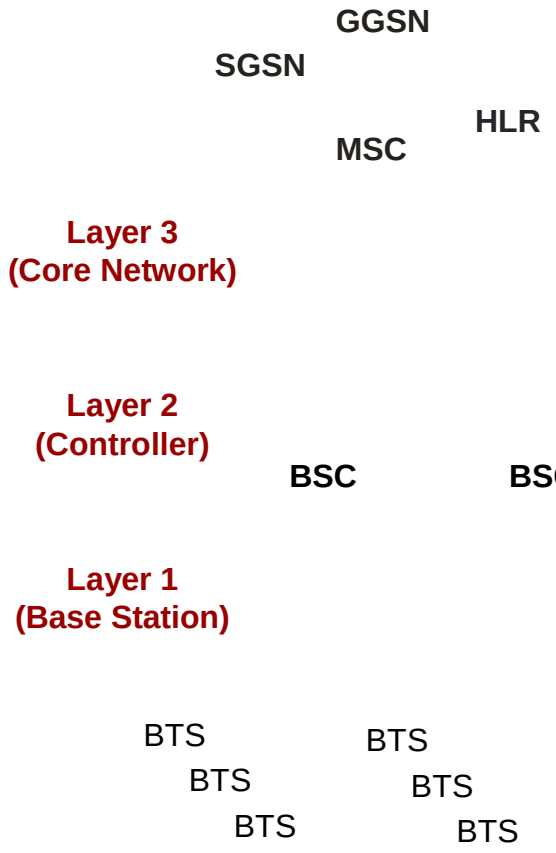
- Lemko's Node2™
  - Provides gateway into legacy networks
  - Routes signaling and traffic for roaming support
  - Point of aggregation for CDRs, voicemail, prepaid, others

Lemko Rural Solution - SAE–FLAT IP Architecture

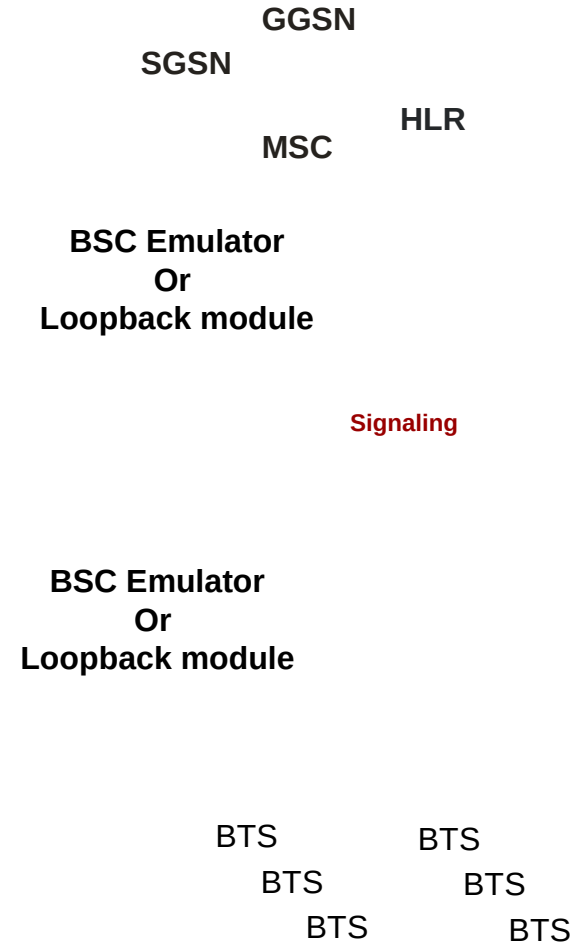


Architecture Difference

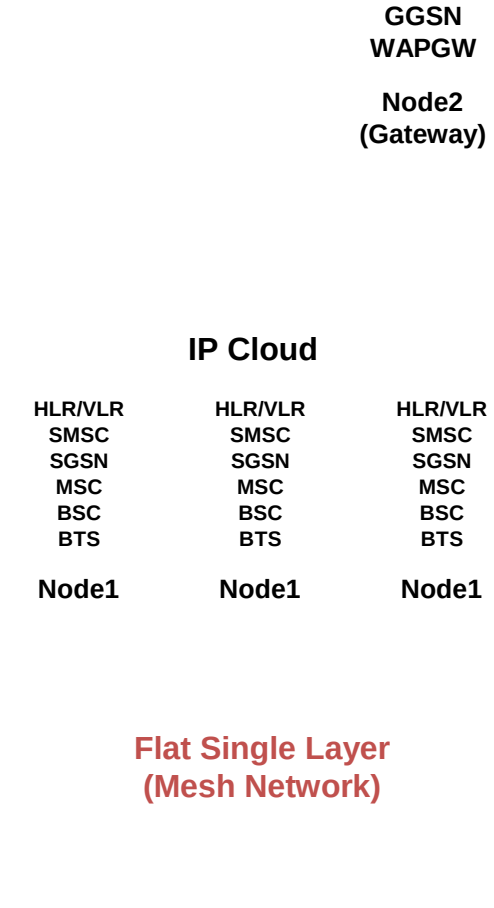
Traditional



Normal Local Switch



Lemko Solution



Feature Support

Typical Traditional Features

- **GSM/GPRS/EDGE Service (Pre-paid, Post-paid, SMS, data, etc.)**
- **Handover between cells, between sites or to existing GSM/UMTS network**
- **Various Voice Codec: EFR, FR, HR, AMR FR/HR**
- **Common BCCH, Hopping, Dual Frequency**
- **Support Various Transmission Scenarios:**
  - Non Transmission: IP Microwave / Satellite (Recommended) / TDM (E1, etc)
  - Existing Transmission: Ethernet / xDSL (Recommended) / IP over E1 / VPN etc.

Special Rural Scenario Features

- **Pure Local Switch: local traffic & signaling or Peer to Peer**
- **Wide Coverage: High Output Power (63W per TRX), Receiver Diversity**
- **Reliability: Self-diagnostic, Self-healing, Remote Failure Notification**
- **Remote & IT-alike Configuration & Maintenance**
- **Local Provision & Charging (Charging policy controlled by operator)**
- **OSS & Billing Integrated into Node1**

Fast & Flexible Deployment

Fast Delivery

- **Light, hand carry**

Flexible Indoor Installation

- **On the wall**
- **On the pole**
- **On the floor**

Flexible Outdoor Installation

- **Rooftop**, no need for shelter & low pole requirement
- **On the tower**, security guaranteed
- **On the concrete pole**, easy site acquisition & CW

Fast Commissioning

- **Half person day**

Automatic Configuring

- **“Plug-in & Play”**

Recommended “All on Pole” Scenario

- **Environmental Control Not Required**
- **Zero Footprint**
- **Easy and Fast Installation**
- **Lower down 70% site cost**

Green Power Solutions

Multiple green power solutions for rural sites with no/hard power access

- Solar Cell Solution
- Wind Power Solution
- Hybrid Solution (Solar & Wind)

OR / AND

Whole Installation on Tower or Roof

Advantages:

- No need for foundation
- No need for security fence or system

Lemko – Economic Game Changer

- OPEX is reduced by 65%
- Breakeven at 1 customer per 2 square miles
- Breakeven at 20k roaming minutes per site
- Old way of doing things - $0.025 per minute switching cost
- Lemko's solution - $0.001 per minute switching cost
- Business case
  - 100 sites
  - 100 square miles coverage
  - Blend of 2k customers and 10k roaming minutes per site
  - $1 million per year cash flow

Lemko – Public Safety Game Changer

- E911 Phase II with a 3-sector single site deployment
- Emergency cell broadcast
- Priority call by cell site
- Rolling coverage for disaster relief and recovery
- Survivability

Rural America – Jump Ahead of the Rest of the World

- Rural America will leap ahead with this wise investment
- Shovel ready
- Very positive job creation and broadband multiplier
- Green
  - 50% deployment target
  - Wind and solar powered
- Re-establish American wireless network technology leadership

LEMKO

HILBERT COMMUNICATIONS

Case Study

HILBERT COMMUNICATIONS, LLC
"Case Study for Rural Broadband"

- THE COMPANY -- Hilbert Communications
  - Merging together 7 entities focused on rural services in the Upper Midwest
  - "See a Need – Fill a Need" is the corporate motto.
  - Initially managed sites for AT&T by building and operating sites that AT&T could not cost justify – went from 2 rural sites in 2005 to 200 sites at the end of 2008.
  - Counties range from 2.0 people per square mile to 55.0 people per square mile.
  - To profitably provide services, needed to develop a new model:
    - Provide all of own backhaul and Internet delivery through licensed/unlicensed microwave and an 1,100 mile fiber-optic network connecting to Tier 1 providers in Chicago
    - Provide unique tower builds through own tower company and construction
    - Provide signaling and routing through Node Two Network, LLC joint venture with LEMKO

HILBERT COMMUNICATIONS, LLC
"Case Study for Rural Broadband"

- RESULTS – Above average in very rural areas
  - Constructing sites for average of $82,000 per site, $92,000 including E-911, when large company counterparts are costing $150,000 to $250,000.
  - Need 50,000 roaming minutes or 75 wireless broadband customers per site to break even. Large counterparts require 200,000 minutes or 300 customers.
  - Can provide calling areas and rates that are competitive or lower than the national averages with EBITDA margins above the national averages.
  - Maintaining strong relationships with national carriers who call upon Hilbert to "fill in" white spaces.
  - Hilbert has identified 300 additional sites in Wisconsin, 400 in Michigan, 160 in Minnesota and 800 in the Dakotas that could be built and Hilbert would be the only GSM provider on 90% of the sites and the only wireless service provider on 15% of the sites.

HILBERT COMMUNICATIONS, LLC
"Case Study for Rural Broadband"

- HOW IS IT DONE? -- The Model
  - Very LOCALIZED SITE ACQUISITION AND CONSTRUCTION MANAGEMENT versus large scale national organizations (but with enough scale to create efficiencies and quality)
  - TECHNOLOGY – Utilizing a 4G architecture with 2G/3G radios and leveraging many services on a single platform:
    - GSM/EDGE/UMTS Roaming
    - Wi-Max Wireless Fixed Broadband
    - VoIP based home and business phone service
    - Monitoring and telematics products
    - LEMKO integrated E911 location based services
  - CREATIVE TOWER CONCEPTS – Bug Tussel manages sites on grain elevators, inside of road-side signs, electronics buried in vaults, on corn storage silos, designed into the trim of homes and resorts, and who knows the next location?

HILBERT COMMUNICATIONS, LLC
"Case Study for Rural Broadband"

- What can Hilbert do with each $1 million investment?
  - Build six 4G architecture GSM/EDGE/UMTS sites today in a county AND
  - Lay 36 miles of fiber-optic cable covering the same county "end to end" AND
  - Install 10 WiMax broadband stations capable of 28 Mbps total uplink/downlink capacity AND
  - Install 12 computer stations in local town halls to provide service to any household in the county with a household family income of less than $15,000 AND
  - Create 5 construction jobs for two years and 8 sustainable jobs to service that county as technicians, sales people, customer service and support.

What Does It Look Like?

Fully Functional Core Network Platform in Software

Off The Shelf Linux Based Server

***Any* RF:**

CDMA
GSM
UMTS
Future

+

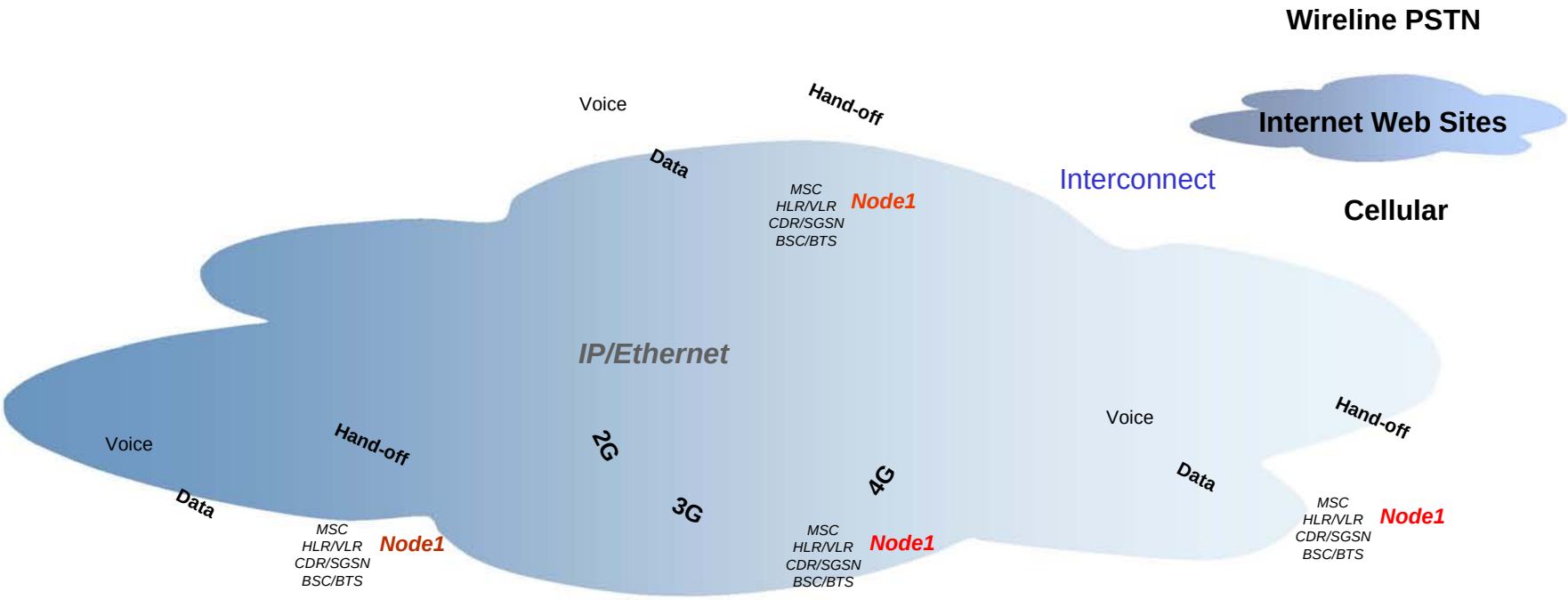
+

Standard BTS

=

A “Complete” Mobile Broadband Network

Lemko is the Network of the Future



Lemko Combines the Internet Architecture with Cellular Mobility for Voice & Data