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October 29, 2009

Via Electronic Delivery

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, D.C. 20554

**Re: Notice of Ex Parte Presentation
In re Applications of Atlantis Holdings LLC, Transferor, and Celco
Partnership d/b/a Verizon Wireless, Transferee, for Consent to the
Transfer of Control of Commission Licenses and Authorizations
Pursuant to Sections 214 and 310(d) of the Communications Act,
WT Docket No. 08-95;**

**In re Request for review by Corr Wireless Communications, LLC of
Decision of Universal Service Administrator,
CC Docket No. 96-45,
WC Docket No. 05-337**

Dear Ms. Dortch:

The Rural Telecommunications Group, Inc. (“RTG”), by its attorney, hereby expresses its concern regarding two ex parte notices recently filed by Verizon Wireless and its attorneys in the above-captioned proceedings.¹ In each of these ex parte filings, Verizon Wireless sums up its meetings with key Federal Communications Commission (“FCC” or “Commission”) staff with its statement that “[w]e discussed implementation of reductions to universal service support for Verizon Wireless pursuant to the Commission’s November 10, 2008 order in the above-referenced proceeding.” While RTG does not doubt that this statement is true, RTG is concerned that Verizon Wireless has not provided a sufficient level of detail concerning its position on this issue. RTG requests that Verizon Wireless file a more expansive ex parte to provide more detailed information about its proposed methodology for reducing the support Alltel is receiving from the high-cost universal service fund.

¹ Letter from L. Charles Keller, Counsel for Verizon Wireless (October 16, 2009); and Letter from Tamara L. Preiss (October 26, 2009).

RTG notes that as a general matter, parties are required by the FCC's rules to provide "more than a one or two sentence description of the views and arguments presented".² The record established through Verizon Wireless' ex parte meetings are scant and do not reflect the ongoing deliberations going on between Verizon Wireless and the FCC on the methodology for reducing Alltel's high-cost support. Because of the interim cap currently in place on competitive eligible telecommunications carriers ("CETCs"), RTG's members are potentially impacted by any proposals or discussions taking place between Verizon Wireless and the FCC. These ex parte meetings should be transparent and allow interested parties to participate. Without this information, RTG and other interested parties are unable to weigh in with their perspective on how Verizon's proposal may impact CETCs. Accordingly, RTG respectfully requests that Verizon Wireless provide more details regarding its positions so that RTG and other parties can better understand Verizon Wireless' universal service policy goals and arguments.

Respectfully submitted,

/s/ Caressa D. Bennet

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² 47 C.F.R. § 1206(b)(2).