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August 11, 2010

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BY HAND DELIVERY

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: WC Docket No. 1-112
Ex Parte Presentation

Dear Ms. Dortch:

The undersigned on behalf of Green Flag Wireless, LLC, CWC Wireless Holdings, Inc., James McCotter and NTCH-CA, Inc. ("Presenters") made an *ex parte* presentation to the Wireless Bureau's staff in connection with the above-referenced Docket. Present for the Wireless Bureau were Kathy Harris, Richard Arsenault, and Michael Connolly. They were provided with hard copies of the comments and petition for reconsideration which Presenters had previously filed in this Docket.

Presenters indicated that the Commission's existing rules contemplate and require a comparison between renewal applicants and challengers and it would be inequitable to change those rules in mid-stream. The Communications Act, as interpreted by the D.C. Circuit, also requires consolidated consideration of both renewal applications and challengers. Apart from the legal requirements, the public interest is served by considering the proposals of applicants willing to do a better job than non-performing incumbents.

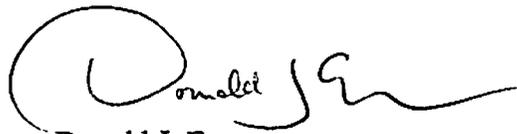
Presenters also indicated that the "conditional renewal" policy adopted by the Commission was counterproductive as well as being contrary to *Ashbacker v. FCC*, and that the ban on all pleadings should not apply to petitions for reconsideration which are allowed by the Communications Act. Possible procedures and comparative criteria for future comparative hearings were also offered.

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Marlene H. Dortch, Esq.
August 11, 2010
Page 2

Presenters further noted a procedural defect in the competing applications of Snapline Communications, Inc.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donald J. Evans". The signature is fluid and cursive, with a large initial "D" and a long horizontal flourish at the end.

Donald J. Evans
Counsel for Presenters

DJE:deb

cc: Kathy Harris
Richard Arsenault
Michael Connolly