



The Voice of Rural & Regional Carriers

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August 18, 2010

Via ECFS

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

**Re: RM-11592
WT Docket No. 06-150
PS Docket No. 06-229
GN Docket No. 09-51
PS Docket No. 07-114**

Dear Ms. Dortch:

On August 17, 2010, Steven K. Berry, President and CEO of the Rural Cellular Association (RCA); Tim Donovan, Director, Legislative Affairs for RCA; Allison Cryor DiNardo, President, King Street Wireless, Inc.; Peter Cramton, Professor of Economics, University of Maryland; and the undersigned met with Commissioner Baker, Charles Mathias, Brad Gillen and Henry Greenidge to discuss the lack of interoperability in the 700 MHz spectrum band and the economic impacts that will result.

As explained in the attached economic paper prepared by Peter Cramton, interoperability throughout the 700 MHz band is crucial for both public safety and consumers to reap the economic benefits of roaming and access to the latest handsets. Device flexibility and interoperability in the 700 MHz band will allow all operators and consumers to enjoy economies of scale, will increase handset competition while decreasing costs, and will improve service, especially in rural areas, with greater coverage and seamless roaming. Lack of interoperability in the 700 MHz band will impose significant costs and burdens upon A Block licensees which will competitively disadvantage smaller and regional carriers, public safety and consumers. RCA requested that the FCC act quickly on the 700 MHz Block A Good Faith Purchasers Alliance Petition to prevent balkanization of the 700 MHz spectrum.

In addition to 700 MHz interoperability, RCA representatives discussed RCA's E911 location accuracy policy with Charles Mathias. RCA requested that the Commission provide an exemption from the new E911 location policy benchmarks to carriers with less than 1 million subscribers and a favorable waiver policy for carriers with less than 10 million subscribers. A complete copy of RCA's E911 location accuracy proposal is attached to this *ex parte* notification.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RM Thompson', with a long horizontal flourish extending to the right.

Rebecca Murphy Thompson
General Counsel

cc: Mr. Charles Mathias
Mr. Brad Gillen
Mr. Henry Greenidge