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August 30, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: United States Cellular Corporation
GN Docket No. 09-51
WC Docket No. 05-337

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceeding. On August 26, 2010, Grant Spellmeyer and undersigned counsel, on behalf of United States Cellular Corporation, met with Jane Jackson, Carol Matthey, Margaret Wiener, Scott Mackoul, Martha Stancill Erik Salovaara (telephonically) and Elise Kohn (telephonically) concerning the Commission's implementation of the National Broadband Plan.

We discussed the difficulties inherent in a competitive auction mechanism for distributing universal service support in the upcoming mobility fund, in particular the problem of establishing competitively neutral service area boundaries for bidding. We also discussed the FCC's longstanding aversion to regulatory actions that skew the marketplace, and in this case the likely re-monopolization of rural areas that now have some competition, but poor service quality.

We also discussed alternatives, such as using a model to establish an amount of support for high-cost areas, which would be available to any carrier with the ability to serve and capture customers. By limiting an amount of support to an area, the Commission could ensure competitive neutrality, allow newcomers to enter the market if they are willing to commit risk capital, while controlling the fund size. Moreover, the Commission would not be in the business of monitoring carrier costs or individual expenditures, since a model would establish the maximum that the government would provide in support to each area.

We also discussed the need to develop a permanent mobility fund, to ensure that rural Americans have access to high-quality mobile broadband services that are reasonably comparable to those available in urban areas, to comply with its obligations under Section 254(b)(3) of the Act. U.S. Cellular's map of West Virginia shows its significant progress since

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recently being designated as an ETC, along with the need to fill in new white areas and also dead zones within existing coverage areas. These kinds of high-cost areas will not be built and maintained without an ongoing program that supports construction, operating expenses, and upgrades. The proposed Mobility Fund, which is designed to be a targeted investment in infrastructure, will not ensure ongoing operations throughout rural America.

We also asked the Commission to clarify that 3G and 4G LTE networks are “dual purpose” networks, as that concept was discussed in the Commission’s 2001 MAG Order. As such, eligible carriers may use high-cost support to construct 3G and 4G LTE networks.

A copy of the materials we provide is attached hereto.

If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria
Counsel for United States Cellular Corporation

cc: Jane Jackson, Esq.
Carol Matthey, Esq.
Margaret Wiener, Esq.
Martha Stancill, Esq.
Scott Mackoul, Esq.
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