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September 23, 2010

VIA ELECTRONIC FILING

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

Re: Cellular South, Inc.
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 September 21, 2010, Eric Graham, Benjamin Moncrief, and undersigned counsel, on behalf of Cellular South, Inc. ("Cellular South"), met with Jane Jackson, Scott Mackoul, Martha Stancill, Gary Michaels, Amy Bender, and Patrick Halley concerning the Commission's implementation of the National Broadband Plan.

Cellular South discussed its participation in the federal universal service program, including the benefits delivered to rural citizens in its ETC service areas in Mississippi and Alabama. Cellular South described how federal support has helped the company build hundreds of cell sites and deliver high-quality services to many rural areas that have been unserved or underserved since the inception of cellular service twenty years ago.

We discussed the difficulties inherent in a competitive auction mechanism for distributing universal service support, including preventing and policing anti-competitive conduct at the auction. 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. We talked about the need to ensure that any phase downs of support under the existing high-cost program be equivalent for all program participants. We also explained that Long Term Evolution ("LTE") networks are dual-purpose networks which permit investment under the current universal service support mechanism.

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Finally, we discussed the need 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.

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

Sincerely,



David A. LaFuria
Counsel for Cellular South, Inc.

cc: Jane Jackson, Esq.
Martha Stancill, Esq.
Amy Bender, Esq.
Scott Mackoul, Esq.
Gary Michaels, Esq.
Patrick Halley, Esq.
Eric Graham, Esq.
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