

September 24, 2010

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Written *Ex Parte* Presentation, GN Docket No. 09-51; WC Docket Nos. 05-337, 10-90.

Dear Ms. Dortch:

On September 23, 2010, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, Scott Bergmann, Assistant Vice President, Regulatory Affairs and David Redl, Director, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”), met with Jane Jackson, Amy Bender, Patrick Halley, Scott Mackoul, Erik Salovaara, Martha Stancill, and Margaret Wiener of the Wireless Telecommunications and Wireline Competition Bureaus.

Consistent with the attached presentation, CTIA encouraged the Commission to adopt comprehensive universal service reform that focuses on consumers and the services they demand, namely mobility and broadband. In addition, CTIA urged the Commission to adopt modest changes to its short-term universal service proposals, including:

- Refraining from implementing reductions to existing CETC support until an alternate mechanism is in place;
- Phasing out legacy high-cost support on the same timeline for all participants;
- Adopting the NPRM’s common sense proposals for reform of legacy incumbent LEC funding; and
- Adopting long-term reforms that are competitively neutral and ensure sufficient support (including on-going support) for the unique attributes and functionalities of mobile broadband services.

Together, these changes would ensure that the Commission’s proposals work for American consumers, who now predominantly rely upon mobile wireless networks for voice communications and are rapidly coming to rely on mobile wireless networks for their data and video services. As the Commission considers its longer-term vision for high cost universal service, it must measure carefully whether proposed changes will facilitate or impede the twin goals of maintaining and advancing the United States’

mobile broadband leadership and fulfilling Section 254's mandate that universal service ensure access to those "reasonably comparable" mobile broadband services that consumers demand.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter and the presentation used during the meeting are being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott Bergmann

Scott Bergmann

Attachment

cc: Jane Jackson
Amy Bender
Patrick Halley
Scott Mackoul
Erik Salovaara
Martha Stancill
Margie Wiener