



The Voice of Rural & Regional Carriers

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October 27, 2010

Via ECFS

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

**Re: RM-11592
GN Docket No. 10-188**

Dear Ms. Dortch:

Rural Cellular Association (RCA) enthusiastically supports the Office of Advocacy, U.S. Small Business Administration (Advocacy) comments¹ filed in the FCC's business broadband marketplace proceeding. RCA whole-heartedly agrees that the broadband market lacks competition as a result of significant hurdles in the current marketplace.² As Advocacy recognizes, the Commission's current lack of rules regarding device interoperability across the 700 MHz spectrum band may make it increasingly difficult for small carriers to compete in the wireless market. RCA echoes Advocacy's call for the FCC to move forward on the 700 MHz Block A Good Faith Purchasers Alliance Petition.³

RCA has advocated for similar Commission action in numerous filings.⁴ Interoperability throughout the 700 MHz band is crucial for rural and regional carriers, 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 carriers, public safety and consumers.

Similar to Advocacy, RCA urgently requests that the FCC act quickly on the 700 MHz Block A Good Faith Purchasers Alliance Petition to prevent balkanization of the 700 MHz spectrum. Economic growth and jobs for rural America hang in the balance.

Sincerely,

/s/

Rebecca Murphy Thompson
General Counsel

cc: Winslow L. Sargeant
Jamie Belcore Saloom

¹ Comments of the Office of Advocacy, U.S. Small Business Administration, *Wireline Competition Bureau Seeks Comment on Business Roundtable Marketplace*; GN Docket No. 10-188 (Oct. 15, 2010) (*Advocacy Comments*).

² See *Advocacy Comments* at 2, 6-7.

³ See 700 MHz Block A Good Faith Purchasers Alliance's Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks; RM-11592 (filed Sept. 29, 2009).

⁴ See letter from Todd B. Lantor, Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in RM-11592 (March 12, 2010); see also letter from Todd B. Lantor, Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in RM-11592 (April 9, 2010); see also letter from Rebecca Murphy Thompson, General Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in WC Docket No. 05-337; CC Docket No. 96-45; WT Docket No. 05-265; WT Docket No. 09-66; and RM-11592 (June 17, 2010); see Comments of Rural Cellular Association, *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions with Respect to Mobile Wireless including Commercial Mobile Services*; WT Docket No. 10-133 (July 30, 2010); see also letter from Rebecca Murphy Thompson, General Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in RM-11592 (Aug. 10, 2010); see also letter from Rebecca Murphy Thompson, General Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in RM-11592; WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51; PS Docket No. 07-114 (Aug. 11, 2010); see also letter from Rebecca Murphy Thompson, General Counsel for Rural Cellular Association, to Marlene H. Dortch, Secretary of the Federal Communications Commission, filed in RM-11592; RM-11487; WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51 (Aug. 23, 2010); see also Doug Hyslop & Chris Helzer, *Wireless Strategy 700 MHz Upper Band Analysis* (May 10, 2010), available in Coalition for 4G in America, Written Ex Parte Presentation, WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51 (May 10, 2010); see also Doug Hyslop & Chris Helzer, *Wireless Strategy 700 MHz Upper Band Analysis* (July 19, 2010), available in Coalition for 4G in America, Written Ex Parte Presentation, WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51 (July 19, 2010); see also Doug Hyslop & Chris Helzer, *Wireless Strategy Lower 700 MHz Interference Management* (July 19, 2010), available in Coalition for 4G in America, Written Ex Parte Presentation, WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51 (Sept. 20, 2010); see also Comments of the Coalition for 4G in America, *Public Safety and Homeland Security Bureau Seeks Comment on Increasing Public Safety Interoperability By Promoting Competition for Promoting Public Safety Communications Technologies*; PS Docket No. 10-168 (Sept. 20, 2010).