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November 3, 2010

Via ECFS

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

**Re: Notice of Ex Parte
Fostering Innovation and Investment in the Wireless Communications Market
GN Docket No. 09-157**

**A National Broadband Plan for Our Future
GN Docket No. 09-51**

**Wireless Competition Docket
WT Docket No. 09-66**

**Wireless Competition Docket
WT Docket No. 10-133**

**Unlicensed Operation in the TV White Space Bands
ET Docket Nos. 04-186 and 02-380**

Dear Ms. Dortch:

On Tuesday, November 2, 2010, the Rural Telecommunications Group, Inc. (“RTG”) represented by undersigned counsel, and Lemko Corporation (“Lemko”), represented by Michele Farquhar of Hogan Lovells, met with Louis Peraertz, Wireless Legal Advisor to Commissioner Mignon Clyburn, to discuss ways to incent spectrum licensees to make their underutilized spectrum available to entities needing spectrum in rural areas to provide mobile broadband services. Lemko discussed the problems it has had in helping rural carriers -- who would like to build out wireless systems using the Lemko solution -- gain access to spectrum to build rural mobile broadband networks. RTG and Lemko suggested that the FCC consider both the demand and supply side when retooling the spectrum dashboard and also consider forming an “Office of Rural Advocacy” that would assist with issues surrounding access to spectrum in rural America among other issues impacting the provision of broadband services in rural America.

RTG raised the issue of its members obtaining access to PCS spectrum being warehoused in rural areas by carriers who have met their population-based build out requirements and who

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have no intention of using the spectrum in the more sparsely populated rural geographic areas. These PCS licensees are not incentivized to lease their spectrum because there is no penalty for not using it.

RTG discussed the concept of charging licensees a “user fee” for spectrum that is not in service as a method to get licensees to lease fallow spectrum in the secondary market.

RTG also reiterated its position on using certain portions of the TV White Spaces for licensed point to point microwave backhaul.

Should you have any questions concerning this ex parte, please contact Michele Farquhar at michele.farquhar@hoganlovells.com or me at cbennet@bennetlaw.com.

Respectfully submitted,

Rural Telecommunications Group, Inc.

/s/ Caressa D. Bennet

By:

Caressa D. Bennet
General Counsel

cc (via email): Louis Peraertz