



The Voice of Rural & Regional Carriers

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February 24, 2011

Via ECFS

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

**Re: WT Docket No. 06-150
WT Docket No. 05-265
PS Docket No. 06-229
GN Docket No. 09-51
RM-11592**

***Ex Parte* Notice**

Dear Ms. Dortch:

On February 23, 2011, Steven K. Berry, President & CEO of the Rural Cellular Association (RCA); Tim Donovan, Director of Legislative Affairs for RCA; Lucy Tutwiler, Director of Media & Communications for RCA; Dr. Raul Katz, President of Telecom Advisory Services, LLC and Adjunct Professor in the Division of Finance and Economics at Columbia Business School; and the undersigned met with Mr. Louis Peraertz to present a study on the economic impact that full deployment of wireless broadband would have on rural America. As explained in the attached presentation and executive summary, Katz's study shows that mandating automatic data roaming and requiring interoperability throughout the 700 MHz spectrum band will enable investment in wireless broadband infrastructure in unserved and underserved areas which will result in the creation and/or retention of 117,000 jobs in the nineteen states that have the lowest broadband availability and penetration in the United States.

Based on the findings in Dr. Katz's study, RCA once again urged the FCC to mandate interoperability across all paired 700 MHz spectrum and mandate automatic data roaming. Without interoperability and data roaming, investment in advanced wireless networks in rural geographies will not materialize because rural carriers face competitive disadvantages including cost prohibitive devices due to lack of scale, the inability to secure data roaming agreements, and inflated roaming costs. The lack of investment in wireless broadband networks will have a negative impact on the ability to create and retain jobs and increase income in rural environments. A copy of the full report can be found on [RCA's website](#).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca', with a long horizontal flourish extending to the right.

Rebecca Murphy Thompson
General Counsel

cc: Mr. Louis Peraertz (via email Louis.Peraertz@fcc.gov)