

March 15, 2011

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

Re: Notice of Ex Parte Communication
CG Docket Nos. 09-158, 10-207

Dear Ms. Dortch,

On Monday, March 14, 2011, Labhesh Patel, CEO and Co-Founder of CellKnight Inc., spoke on the phone with David Tannenbaum of the Office of General Counsel.

Mr. Patel is a veteran of the telephony industry with 49 granted patents related to telecommunications and over 100 patents pending at the US Patents and Trademark Office. Prior to CellKnight, he worked at Cisco systems, Inc. where one of his primary responsibilities was creating intellectual property in the field of unified communications and related areas.

During the conversation we discussed Mr. Patel's experience creating a service that alerts consumer and business users of mobile services when they are close to incurring overage fees.

With respect to delays between actual customer usage and alerts, Mr. Patel reported that over the last few years delays have gotten shorter and shorter, and most accounts are updated within a few hours. Because modern database technology is very efficient, longer delays would result only if the system were specifically engineered to create delays. There may, however, be longer delays when a customer is roaming, as providers then have to rely on other providers to report updated usage information.

Mr. Patel reported that in his experience 99 percent of consumers do not need instant overage updates for voice services because usage typically accrues relatively slowly -- a consumer can only spend so many minutes on the phone in a given day. Data may be consumed much more quickly, but Mr. Patel believes that because most data billing systems have been installed within the last few years, they have the capability to provide alerts with very little lag time.

The cost of running CellKnight's free service for consumers is approximately \$100 per month to support a server that can handle approximately 5,000 users. He estimated that it would cost Cell Knight \$10,000-\$20,000 a month in server costs to handle 10 million

consumers. He also noted that CellKnight takes many more steps to get to consumer data than a mobile provider would, and the provider's costs should be significantly less than CellKnight's.

Respectfully submitted,

David Tannenbaum /s/
Special Counsel
Federal Communications Commission