



The Competitive Carriers Association

805 15th Street NW, Suite 401
Washington, DC 20005
Office: (202) 449-9866 • Fax: (866) 436-1080

May 9, 2011

Via ECFS

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

Re: RM-11592

Dear Ms. Dortch:

On May 6, 2011, Tim Donovan, Vice President, Legislative Affairs for Rural Cellular Association (RCA); In-Sung Yoo, Assistant Legislative & Regulatory Counsel for RCA; Matthew Brill of Latham & Watkins LLP, counsel to RCA; and the undersigned met briefly with Josh Gottheimer, Senior Counselor to Federal Communications Commission (FCC or Commission) Chairman Julius Genachowski, to discuss RCA's views on the potential use of incentive auctions.

RCA noted its general approval for the use of incentive auctions as a means of procuring additional spectrum for mobile broadband buildout, but expressed its concerns for the ability of competitive carriers to take full advantage of the opportunity without certain measures. In particular, RCA urged the Commission to address Channel 51 interference concerns in the Lower A Block and interoperability of devices across the 700 MHz band. By doing so, the Commission would help establish a stable and predictable 700 MHz spectrum environment, thus giving Lower A licensees the assurance they need to start rapid buildout of advanced mobile networks. Additionally, the Commission should ensure that any incentive auction pursued by the Commission be structured so that smaller carriers would be encouraged to participate. Without such measures, the incentive auctions stand to do nothing more than expand the already bloated spectrum holdings of Verizon and AT&T and further entrench the two companies as a duopoly.

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

Sincerely,

/s/

Steven K. Berry
President and CEO

cc: Josh Gottheimer (via email)