



The Competitive Carriers Association

Rural Cellular Association

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Via ECFS

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

**RE: WT Docket No. 06-150
Service Rules for the 698-746, 747-762 and 777-792 MHz Band
OMB Approval Needed for 700 MHz Performance Status Reports
RM-11592**

Dear Ms. Dortch,

RCA has learned that on June 3, 2011, in response to a query from CTIA – The Wireless Association, a letter of reply was sent from the General Counsel’s office to CTIA confirming that the obligation of certain 700 MHz licensees to file performance status reports under the 700 MHz Second Report and Order was postponed, due to the fact that formal announcement of the effective date in the Federal Register had yet to occur. Upon learning of these developments, RCA informed its carrier members of the contents of the letter and advised them to proceed accordingly.

As RCA continues to keep its members abreast of these requirements, we also find it appropriate at this time to reassert the potential difficulties that RCA carrier members may face as a result of the lack of interoperable equipment. Competitive carriers continue to see their otherwise aggressive buildout plans hampered by the lack of interoperability across the 700 MHz band. The market for devices that will operate across all paired 700 MHz Band Classes has been compromised by the artificial limitations built into devices that have been drawn to the specifications of dominant Band Class 17 and Band Class 13 licensees. Without devices to distribute to customers, 700 MHz buildout becomes infinitely more complicated. Additionally, the lack of interoperability creates a technical barrier to roaming. RCA strongly urges the FCC to move forward expeditiously on these pressing issues.

Sincerely,

/s/

Steven K. Berry
President & CEO

cc: Mr. Austin Schlick, General Counsel
Mr. Rick Kaplan, Chief Counsel and Senior Legal Advisor, Office of the Chairman
Mr. Jim Schlichting, Senior Deputy Bureau Chief, Wireless Telecommunications Bureau
Mr. Tom Peters, Chief Engineer, Wireless Telecommunications Bureau