



**The Competitive Carriers Association**

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

June 22, 2011

**Via ECFS**

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

**Re: WC Docket No. 10-90  
GN Docket No. 09-51  
WC Docket No. 07-135  
WC Docket No. 05-337  
CC Docket No. 01-92  
WT Docket No. 05-265  
WT Docket No. 11-65  
RM-11592**

Dear Ms. Dortch:

On June 20, 2011, a group of RCA board members and counsel including Michael Prior, President and CEO of Atlantic Tele-Network; Dan Boyette, Vice President of GCI Communications Corp; Megan Delany, Vice President, Federal Governmental Affairs and Counsel of GCI Communications Corp.; Bob Dawson, President and CEO of SouthernLINC Wireless and Southern Telecom; Linda Martin, Executive Vice President and COO of Keystone Wireless, dba Immix Wireless; David Peters, Vice President, Sales and Marketing of Velleros; Mark Stachiw, Executive Vice President, General Counsel and Secretary of MetroPCS; Steven Berry, President and CEO of RCA; Tim Donovan, Vice President, Legislative Affairs of RCA; Matthew Brill of Latham & Watkins LLP, counsel to RCA; and the undersigned met with Chairman Genachowski, Zac Katz, and Amy Levine to discuss their views on a range of issues in the above-noted dockets.

The board members addressed device interoperability, universal service support, and the proposed AT&T-T-Mobile merger. First, the board members expressed support for device interoperability across all 700 MHz broadband spectrum. Noting the benefits of interoperability for the commercial wireless market as well as public safety entities, the board members urged the Commission to move quickly on this critical issue. The board members also pointed out that interoperability is a key to successful network buildout of 700 MHz licenses for smaller carriers and that positive returns on those licenses would likely encourage those carriers to participate in future spectrum auctions.

The RCA board members also discussed reform of the Universal Service Fund. The board members noted the benefits of funding that is success-based—i.e., portable—forward-looking, and

competitively/technologically neutral. Based on the increasing consumer preference for mobile technologies, the board members recommended the Commission adopt policies that align with that preference, treating wireless connectivity as an important means of broadband deployment and avoiding entrenchment of single providers within a given area. Additionally, the board members presented a copy of U.S. Cellular's Mobile Broadband Cost Model, which is attached hereto.

Finally, the board members discussed the proposed merger of AT&T and T-Mobile, explaining that the transaction could significantly harm competition. The board members expressed concerns that approval of this transaction might irretrievably damage the state of competition and innovation in the wireless sector, and fully cement the position of AT&T and Verizon as duopoly powers.

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

Sincerely,

/s/

Rebecca M. Thompson  
General Counsel, RCA

cc: Chairman Julius Genachowski (via email)  
Mr. Zac Katz (via email)  
Ms. Amy Levine (via email)