

LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200
MCLEAN, VIRGINIA 22102
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
DAVID A. LAFURIA
PAMELA L. GIST
TODD SLAMOWITZ*
BROOKS E. HARLOW*
TODD B. LANTOR*
STEVEN M. CHERNOFF*
KATHERINE PATSAS NEVITT*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEILA REZANAVAZ
—
OF COUNSEL
GEORGE L. LYON, JR.
LEONARD S. KOLSKY*
JOHN CIMKO*
J. K. HAGE III*
JOHN J. MCAVOY*
HON. GERALD S. MCGOWAN*
TAMARA DAVIS BROWN*
JEFFREY A. MITCHELL
ROBERT S. KOPPEL*

*NOT ADMITTED IN VA

July 25, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service
WC Docket No. 05-337; CC Docket No. 96-45;
GN Docket No. 09-51; WC Docket No. 06-122
CC Docket No. 01-92

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceeding. On Thursday, July 21, 2011, Jonathan Foxman (via telephone) and Julia Tanner of MTPCS, LLC ("MTPCS"), along with undersigned counsel, met with Jim Schlichting, Margaret Wiener, Martha Stancill, Susan McNeil, Chelsea Fallon, Tom Peters, Pramesh Jobanputra, Patrick Halley, Theodore Burmeister and Erik Salovaara to discuss universal service reform.

We discussed the FCC's proposed actions in the above-referenced dockets, relating to the Mobility Fund and the Connect America Fund. In particular, MTPCS urged reform that recognizes the critical need for improved mobile broadband infrastructure in rural America. MTPCS expressed support for studying whether a model would provide an opportunity to control fund growth without skewing the marketplace.

In order to ensure rural consumers have access to services reasonably comparable to those available in urban areas, MTPCS urged that sufficient ongoing support must be provided to maintain a healthy mobile marketplace, and if such support is provided, the Commission should move to a system of two funds, one for fixed broadband and one for mobile broadband.

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MTPCS also noted that failure to support existing high cost sites, by withdrawing support currently provided in any area where some other carrier provides service, would affect the inputs for necessary core costs. Competitive eligible telecommunications carriers (“CETCs”) receive just one quarter of the high cost fund and are rapidly deploying broadband coverage in many rural, high cost and insular areas that need such deployments if the country is to keep pace with other nations’ deployments. Adequately supporting rural wireless systems is the most logical and the fastest way to ensure that broadband will continue and expand in rural areas. Since almost half of the nation (and growing) relies upon wireless as the primary means of communication, support for wireless broadband is the most dependable way to ensure that the broadband needs of the nation will be met.

MTPCS distributed a document setting forth likely impacts of certain proposed Commission rulemaking actions on its business operations and ability to continue providing service in high-cost rural areas. The document was appropriately marked as confidential and MTPCS will also submit to the Commission, under separate cover, a copy which will be marked **“CONFIDENTIAL – NOT FOR PUBLIC INSPECTION.”**

If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria

cc: J. Foxman
J. Tanner
J. Schlichting
M. Wiener
M. Stancill
S. McNeil
C. Fallon
T. Peters
P. Jobanputra
P. Halley
T. Burmeister
E. Salovaara