September 9, 2011

Via Electronic Filing
Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Written *Ex Parte* Presentation, GN Docket No. 09-51; WC Docket Nos. 96-45, 05-337, 10-90; CC Docket No. 01-92.

Dear Ms. Dortch:

On September 8, 2011, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Scott Bergmann, Assistant Vice President, Regulatory Affairs, both of CTIA – The Wireless Association® ("CTIA"), met with Margaret McCarthy, Policy Advisor for Wireline to Commissioner Michael Copps. During this meeting, CTIA encouraged the Commission to adopt comprehensive universal service reform that focuses on consumers and the services they demand, namely mobility and broadband. CTIA explained, consistent with it filings in this proceeding, that the proposed ABC Plan advances several key goals, particularly in the area of intercarrier compensation reform, by focusing on the development of low, uniform cost-based rates, calling for access replacement mechanisms to be used only as transitional tools, and calling for expeditious solutions to traffic pumping.[1] CTIA also offered a number of specific recommendations for improving the proposed framework.

Most significantly, CTIA emphasized that it is critical for the Commission to develop a robust, ongoing mobility fund that will help facilitate the wireless broadband goals of the President and the Commission.[2] Consumers are rapidly migrating to mobile broadband, and a sufficient mobility fund that ensures that Americans have access to those services is consistent with the goals of Congress, the National Broadband Plan, and the Commission. CTIA applauded the recognition in several recent reform proposals of the need for on-going support for mobile services; however, CTIA noted that the funding levels proposed appear insufficient to meet the needs of mobile broadband consumers in high-cost areas. CTIA explained that, in determining the appropriate size of a proposed Mobility Fund, the Commission must engage in a fact-based analysis and take account of the fundamental nature of mobile networks, which must be available wherever Americans live, work, and travel.

[1] Comments of CTIA-The Wireless Association®, WC Docket No. 10-90 at 3-13 (August 24, 2011) ("CTIA Comments").
[2] *See* CTIA Comments at 14-18.

In addition, CTIA encouraged the Commission to exercise its authority to transition intercarrier compensation rates quickly to lower, more uniform levels. Reform will benefit consumers, eliminate incentives for schemes such as traffic pumping, and increase economic efficiency. CTIA reiterated that any access replacement mechanisms, if adopted, should be eliminated after a reasonable transition and should utilize a rate benchmark. Such a benchmark should take into account the price of competitive services, and can ensure that excessively low rates are not subsidized and reward states that have already undertaken reform.

Finally, with respect to both access replacement and high-cost-universal-service mechanisms, CTIA explained that the Commission should take care to limit the impact of support mechanisms on the increasingly competitive marketplace by crafting mechanisms that are time limited and that do not ensure that rate-of-return carriers are "made whole" out of universal service for competitive losses.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ *Scott Bergmann*

Scott Bergmann