



Law Offices of Bennet & Bennet, PLLC

Maryland

4350 East West Highway, Suite 201
Bethesda, Maryland 20814
Tel: (202) 371-1500
Fax: (202) 371-1558
www.bennetlaw.com

District of Columbia

10 G Street NE, Suite 710
Washington, DC, 20002

Caressa D. Bennet
Michael R. Bennet
Marjorie G. Spivak^{*}
Kenneth C. Johnson[‡]
Howard S. Shapiro
Daryl A. Zakov[^]
Robert A. Silverman
Anthony K. Veach[#]

Of Counsel

Andrew Brown[◇]

*Admitted in DC & PA Only

‡Admitted in DC & VA Only

^Admitted in DC & WA Only

◇Admitted in DC & ME Only

#Admitted in DC & FL Only

October 17, 2011

VIA ECFS

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

Re: Notice of Ex Parte

Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
High-Cost Universal Service Support, WC Docket No. 05-337
Federal-State Joint Board on Universal Service, CC Docket No. 96-45

**Reexamination of Roaming Obligations of Commercial Mobile Radio Service
Providers and Other Providers of Mobile Data Services
WT Docket No. 05-265**

Dear Ms. Dortch:

On Thursday, October 13, 2011, the undersigned representing the Rural Telecommunications Group, Inc. (“RTG”) spoke via telephone with Mr. Louis Peraertz, Legal Advisor to FCC Commissioner Clyburn, regarding the impact of roaming on the proposed Mobility Fund and upcoming reform related to the universal service fund. Our discussion concerned the impact on the universal service fund of the recent trend of large wireless carriers (who have entered into bi-lateral roaming agreements with small rural carriers) to prevent their customers from roaming on the rural carriers’ networks. In addition to the public harm to customers of these larger wireless carriers from not being able to obtain service where service is available, indirect harm to the public is caused by the economic impact of such behavior on rural carriers. RTG noted that the lack of this roaming revenue means that rural carriers are even more dependent on universal service funds. The trend of large carriers blocking their own customers from accessing rural carriers’ networks (in areas where these large carriers have no network available) means that a rural wireless carrier will need additional universal service funding thereby putting more pressure on the universal service fund at a time when the Commission is attempting to lower the fund.

October 17, 2011
Page 2 of 2

Should you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

By: */s/ Caressa D. Bennet*

Caressa D. Bennet

cc: Louis Peraertz