

October 21, 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 October 19, 2011, Steve Largent, President and CEO of CTIA – The Wireless Association® (“CTIA”), along with Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Scott Bergmann, Assistant Vice President, Regulatory Affairs, both of CTIA, met with Edward Lazarus, Chief of Staff to FCC Chairman Julius Genachowski. 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, and to move forward with reform of the intercarrier compensation system, by focusing on the development of low, uniform cost-based rates and expeditious solutions to traffic pumping.<sup>1</sup>

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.<sup>2</sup> 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 Commission’s recognition of the need for on-going support for mobile services; however, consistent with prior filings, CTIA noted that the funding levels proposed are insufficient to meet the needs of mobile broadband consumers in high-cost areas.<sup>3</sup>

---

<sup>1</sup> Comments of CTIA-The Wireless Association®, WC Docket No. 10-90 at 3-13 (August 24, 2011) (“CTIA Comments”).

<sup>2</sup> See CTIA Comments at 14-18.

<sup>3</sup> See, e.g., Letter from Steve Largent, President and CEO, CTIA, to the Hon. Julius Genachowski, Chairman, Federal Communications Commission, WC Docket No. 10-90 (Oct. 18, 2011); Letter from Scott Bergmann, Assistant Vice President, CTIA, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (Sept. 29, 2011); Letter from Christopher Guttman-McCabe Vice President, Regulatory Affairs, and Scott Bergmann, Assistant Vice President, CTIA to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (Sept. 22, 2011).

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 reiterates 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.

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