

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”), spoke with Commissioner Robert M. McDowell, Federal Communications Commission, via telephone. During this conversation, Mr. Largent 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.¹ Mr. Largent 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. Mr. Largent noted that the funding levels proposed are insufficient to meet the needs of mobile broadband consumers in high-cost areas.³

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.

³ 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).

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