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October 21, 2011

VIA ELECTRONIC FILING

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

Re: Smith Bagley, Inc.
WC Docket No. 10-90, 07-135, 05-337, and 03-109
GN Docket No. 09-51, CC Docket No. 01-92 and 96-45

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 October 21, 2011 undersigned counsel, on behalf of Allied Wireless Communications Corporation, Commnet Wireless, LLC, C Spire Wireless, MTPCS, LLC d/b/a Cellular One, NE Colorado Cellular, Inc., d/b/a Viaero Wireless, Nex-Tech Wireless, LLC, PR Wireless d/b/a Open Mobile, and United States Cellular Corporation (the "Wireless Companies"), spoke via telephone with Zachary Katz to discuss universal service support and intercarrier compensation reform.

The Wireless Companies reiterated advocacy previously made in the record of these proceedings.

The Wireless Companies explained that if the Commission intends to limit the Mobility Fund to significantly less support than carriers are receiving today, then it becomes even more imperative that rights of first refusal in the Connect America Fund ("CAF") be done away with, and to structure the CAF so that incumbents cannot reserve all of the funding or lock out competitors.

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The Wireless Companies urged bill and keep as the solution to intercarrier compensation, as it will accelerate the technological shift to all-IP networks and reduce arbitrage in the meantime.

The Wireless Companies noted that private loans that they have taken out are subject to disruption from flash cuts, which should be avoided. The Wireless Companies understand that a measured transition to new mechanisms may require industry participants to make adjustments, including restructuring loans. Any Commission action to give special treatment to companies borrowing funds from the Rural Utilities Service must be disfavored. Companies borrowing from the RUS have demonstrated no compelling reason for receiving preferential treatment, compared to those accessing capital from non-governmental sources.

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

Sincerely,



David A. LaFuria
Counsel for
Allied Wireless Communications Corporation
Commnet Wireless, LLC,
C Spire Wireless
MTPCS, LLC d/b/a Cellular One
NE Colorado Cellular, Inc., d/b/a Viaero Wireless
Nex-Tech Wireless, LLC
PR Wireless d/b/a Open Mobile
United States Cellular Corporation

cc: Zachary Katz, Esq.