

February 2, 2012

***Via Electronic Filing***

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

**Re: Notice of *Ex Parte* Presentation, RM-11510, PS Docket No. 11-82**

Dear Ms. Dortch:

On February 1, 2012, Christopher Guttman McCabe and Brian Josef of CTIA – The Wireless Association® (“CTIA”), along with Jeanine Poltronieri of AT&T and Tamara Preiss of Verizon Wireless met with Louis Peraertz, Legal Advisor to Commissioner Mignon L. Clyburn.

During the meeting, CTIA discussed its Petition for Rulemaking to transition Part 22 cellular licenses from site-based to geographic market-area licensing. The parties expressed strong support for the Commission moving forward with a Notice of Proposed Rulemaking in this proceeding. The parties also raised concerns with a proposal that would apply an “overlay auction” mechanism, possibly implemented as part of the transition from site-based to geographic licenses, for use in areas that are not substantially served. CTIA expresses its hope that the Commission keeps an open mind in considering all potential approaches in addressing appropriate mechanisms for providing service to currently unserved areas.

In addition, CTIA mentioned the Commission’s proceeding seeking to ensure reliable access to emergency services through reporting regulations in the event of a full, or “hard outage,” occurring to interconnected VoIP service. CTIA addressed the reasonableness of reporting requirements for interconnected VoIP service, relative to broader rules proposed in the Commission’s Notice of Proposed Rulemaking. In this vein, CTIA noted the potential for such regulations to be less onerous and less costly. Accordingly, CTIA urged that any reporting requirements should be narrowly tailored and manageable.

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/ Brian M. Josef*

Brian M. Josef  
Assistant Vice President – Regulatory Affairs  
CTIA-The Wireless Association®

cc: Louis Peraertz