

555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004-1304
Tel: +1.202.637.2200 Fax: +1.202.637.2201
www.lw.com

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May 10, 2012

VIA ECFS

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

**Re: Cricket Communications, Inc., Notice of Ex Parte Communication,
WC Docket No. 08-71**

Dear Ms. Dortch:

On May 9, 2012, the undersigned counsel to Cricket Communications, Inc. (“Cricket”) met with Trent Harkrader and Amy Bender of the Wireline Competition Bureau. Julie Buechler, Manager of Government Programs for Cricket, participated via telephone.

During the meeting, Cricket expressed its concern that the Universal Service Administrative Company (“USAC”) has suggested it might attempt to reduce to zero the Local Switching Support (“LSS”) received by Cricket in South Carolina for calendar year 2010. Cricket explained that USAC appears to have considered such action, under the “identical support” rule (47 C.F.R. § 54.307(a)), because the incumbent local exchange carriers serving the relevant geographic areas in South Carolina had failed to comply with the LSS “true-up” requirements specified in Section 54.301(e) of the Commission’s rules. *See* Hargray Telephone Company and Bluffton Telephone Company, Petition for Waiver of Section 54.301(e) of the Commission’s Rules, WC Docket No. 08-71 (filed Feb. 17, 2012); 47 C.F.R. § 54.301(e).

Cricket urged Commission staff to direct USAC to refrain from taking any such action. Cricket noted that reducing Cricket’s LSS for 2010 to zero would be inequitable and would punish Cricket for the noncompliance of third parties over which Cricket has no control. Cricket also noted that such action would be inconsistent with the Commission’s existing regulations and policies. Cricket indicated that granting the Hargray/Bluffton waiver petition would eliminate any basis for USAC to take action adverse to Cricket in this matter, but, in any event, USAC has no legal or policy basis to seek reimbursement from Cricket.

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Please contact the undersigned if you have any questions about these issues.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill
Jarrett S. Taubman

Counsel to Cricket Communications, Inc.

cc: Trent Harkrader
Amy Bender