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November 20, 2012

Via ECFS

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

Re: Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the Cellular Service, Including Changes in Licensing of Unserved Areas; Amendment of the Commission's Rules with Regard to Relocation of Part 24 to Part 27; Interim Restrictions and Procedures for Cellular Service Applications, WT Docket No. 12-40, RM No. 11510

Dear Ms. Dortch,

On November 19, 2012, undersigned counsel and Linda Braboy representing the Rural Telecommunications Group, Inc. met with John Leibovitz, Deputy Chief, Wireless Telecommunications Bureau, Roger Noel, Division Chief of the Mobility Division, Denise Walter, Associate Chief of the Mobility Division, Nina Shafran, Senior Attorney of the Mobility Division and Brian Regan, Legal Advisor to the Wireless Telecommunications Bureau to discuss the transition of Part 22 cellular radio service from site-based to geographic-area based licensing.

RTG expressed its concerns with utilizing an auction to transition the cellular radio service to geographic-based licensing. RTG noted that if the FCC were to move forward with an auction that there should be eligibility criteria for participation, namely that auction participation should be limited to incumbent licensees in each cellular market area and noted that this may lead to instances of cellular market areas without mutual exclusivity which would prevent the FCC from holding an auction in such markets under its statutory auction authority. RTG also expressed concern with the FCC's proposal to allow a geographic license winner who is not also the incumbent licensee to have a reversionary interest in areas that the incumbent licensee serves but may later stop serving for periods of time beyond what is currently allowed by Part 22 Rules.

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RTG expressed its understanding that the Commission needs to find ways to reduce the administrative burdens associated with processing site by site licensing applications and informed staff that it is willing to explore other non-auction options for reducing these burdens.

Respectfully submitted,

/s/ Caressa D. Bennet

Caressa D. Bennet

cc (via email): John Leibovitz
Roger Noel
Denise Walter
Nina Shafran
Brian Regan