

April 17, 2013

Via Electronic Filing

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

Re: Notice of *Ex Parte* Presentation, WT Docket No. 12-40; RM-11510

Dear Ms. Dortch:

On April 15, 2013, Linda Vandeloop, Jeanine Poltronieri (via telephone), and Robert Vitanza (via telephone) of AT&T, Dave Dengel of Copper Valley Wireless and The Rural Telecommunications Group, Inc., Brian Josef of CTIA – The Wireless Association® (“CTIA”), Jill Canfield of NTCA (via telephone), Carri Bennet of The Rural Telecommunications Group, Inc., Peter Connolly of Holland & Knight LLP representing U.S. Cellular, Bill Tortoriello (via telephone) of U.S. Cellular, and Tamara Preiss and Michael Samscock (via telephone) of Verizon Wireless, met with John Leibovitz, Office of the Bureau Chief, Roger Noel, Division Chief, Mobility Division, Lloyd Coward, Nina Shafran, Denise Walter and Brian Regan, all of the Wireless Telecommunications Bureau (“WTB”).

During the meeting, the parties discussed a proposal to convert site-based CGSA coverage areas to geographic licenses entitled to primary interference protection. The parties also suggested that any unserved area less than 50 square miles bordered by only one incumbent would become part of the incumbent’s geographic license. Any unserved area less than 50 square miles bordered by more than one incumbent could only be allocated to geographic licenses with written agreement by all bordering incumbents. Absent agreement, those areas can only be served on a secondary basis. After this initial conversion, if a licensee seeks to expand into an unserved area, the expansion must serve at least 50 square miles in order to become part of the geographic license and would occur under the FCC’s current Phase II approach. If a licensee seeks to expand in an area less than 50 square miles, the licensee could serve the area on a secondary basis without any interference protection.

The parties also discussed the potential outsourcing of the application process, requiring carriers to work with third party frequency coordinators in preparing and filing with the FCC applications to expand into unserved areas. The parties also discussed the

potential costs from frequency coordinator fees and FCC application fees that cellular licensees could face under such an approach.

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: John Leibovitz
Roger Noel
Lloyd Coward
Nina Shafran
Denise Walter
Brian Regan