

November 15, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

***Re: Notice of Ex Parte Presentation
MD Docket Nos. 13-140, 12-201, 08-65***

Dear Ms. Dortch:

On November 13, 2013, Krista Witanowski of CTIA – The Wireless Association® (“CTIA”), Anisa Latif of AT&T, Ann Berkowitz of Verizon, Indra Chalk of T-Mobile, and Adam Krinsky of Wilkinson Barker Knauer LLP, met with Dana Shaffer and Roland Helvajian of the Office of Managing Director and Mika Savir of the Enforcement Bureau to discuss the above-captioned proceedings.

In advance of the upcoming notice of proposed rulemaking, the parties discussed several of the issues the Commission had identified for further consideration in the 2013 regulatory fees order. CTIA and its members again expressed its concerns with any proposal to impose ITSP regulatory fees on wireless regulatees. CTIA noted that there is no basis for a uniform category as the wireless and wireline industries are subject to different regulatory regimes and the full-time equivalents (“FTE”) in the Wireless Telecommunications Bureau and the Wireline Competition Bureau engage in different tasks and administer different regulations. Moreover, under Section 9 of the Communications Act the Commission may only make permitted amendments to the regulatory fee framework in response to a specific change in law or regulation, and no such change exists to justify imposing ITSP regulatory fees on the wireless industry. Further, CTIA noted that the wireless industry supports a greater portion of the Commission’s budget than any other industry segment given its contributions through spectrum auction revenues, and this fact alone is relevant to any discussion involving fairness and claims that some sectors do not contribute enough.

CTIA reiterated its concerns with exploring reapportioning FTEs based on contemporaneous workload given the vagaries of such assessments and the potential substantive issues shifting on an annual basis. CTIA and its members also responded to questions regarding whether to shift wireless regulatee fees from a subscriber basis to a revenue basis and identified concerns regarding implementation and purported benefits.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please let the undersigned know if you have any questions regarding this filing.

Sincerely,

/s/ Krista Witanowski

Krista Witanowski
AVP Regulatory Affairs
CTIA – The Wireless Association®

cc: Dana Shaffer
Roland Helvajian
Mika Savir