September 26, 2005

Via Electronic Delivery

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

Re: Notice of Ex Parte Presentation

Dear Ms. Dortch:

On Friday, September 23, 2005, Ms. Caressa D. Bennet, Ms. Jessica H. Bridges, Mr. Gregory W. Whiteaker, Mr. Michael R. Bennet, Mr. Kenneth C. Johnson, Mr. Joshua P. Zeldis, and Mr. James C. Egyud of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group, Inc. (“RTG”), Mr. David S. Fauske, Mr. Don May, Mr. John Monfils, and Mr. Ralph Achenbach of Arctic Slope Telephone Association Cooperative, Mr. Jerry Wilke and Mr. Mike Mitchell of Siouxland PCS, Mr. Bill Wade and Ms. Becky Schmidt of Mid-Rivers Cellular, Mr. Kelly Bond of Public Service Cellular, Mr. Ron Strecker of Panhandle Telephone Cooperative, Mr. Chris Ruhl and Jerry Kadavy of Pioneer Telephone Cooperative, Mr. Robert Mauer of Cellular 29, and Mr. Glenn Ishihara of NTCH, Inc. d/b/a ClearTalk, also on behalf of RTG, met with Brian Marenco, Jane Jackson, Margaret Wiener, Gary Michaels, Paul Murray, Jeff Cohen, and Mr. David Furth of the Wireless Telecommunications Bureau. RTG discussed its positions on the following issues:

1) CMRS Competition and Spectrum Auctions (WT Docket No. 00-230)
   700 MHz (GN Docket No. 01-74 WT Docket No. 99-168)
   Automatic Roaming (WT Docket No. 05-265)

   RTG reiterated its position that spectrum ought to be auctioned in small geographic areas with urban and rural distinctions in order to make rural spectrum available to small, rural carriers that generally serve these areas. RTG mentioned that smaller geographic areas make spectrum available for crucial rural broadband applications. RTG mentioned the successes, so far, that its members have had in implementing broadband services using 700 MHz spectrum. RTG mentioned that it would be submitting a band plan for the remaining un-auctioned 700 MHz spectrum in the next week or so. RTG also noted that the lack of designated entity winners in certain auctions had led to a decrease in willing roaming partners.
2) Combinatorial Bidding and Spectrum Enhancement  
(WT Docket No. 05-211)

RTG, consistent with its comments filed in this proceeding, noted that it was opposed to combinatorial bidding that would maximize revenue at the expense of rural areas. RTG worries that large “packages” that generate more overall revenue will be preferred by a combinatorial bidding mechanism over small, rural bids. Even if the small, rural bidder values a small patch of spectrum more than the larger carrier, RTG is afraid that the larger packages will inevitably win, leaving rural consumers without access to new services since rural areas are often overlooked by larger carriers. RTG also expressed concern over the complexity and expected length of combinatorial bidding auctions. RTG asked that its members be allowed to participate in future mock auctions testing combinatorial bidding in order to provide the Commission with the rural carrier “mindset.”

3) Handset Lockdown  
Hearing Aid Compatibility (WT Docket No. 01-309)

RTG discussed certain cases where rural customers were unable to use their handsets purchased from rural carriers after these customers used a national carrier for a short time and then migrated back to the original rural carrier. The large carriers are locking the handsets, making them unusable on another carrier’s network, defeating the purpose of number portability.

RTG noted that many small, rural carriers had hoped to be able to begin selling hearing aid compatible handsets prior to the FCC’s deadline, but were forced to file waivers at the last minute when such handsets remained unavailable.

4) Emergency 911 (CC Docket No. 94-102)

RTG discussed the Cellular Telecommunications and Internet Association (“CTIA”) / Rural Cellular Association (“RCA”) petition regarding an extension of the Commission’s requirement that 95 percent of a carrier’s customers must have location-capable handsets by December 31, 2005 if the carrier has chosen a handset-based emergency 911 solution. RTG is generally supportive of the petition and noted that individual rural carriers were likely to be filing similar pleadings.

Pursuant to Section 1.1206(b) of the Commission’s Rules, this letter is being filed electronically. Please refer any questions regarding this matter to the undersigned counsel.

Best regards,

/s/
Kenneth C. Johnson

cc: David Furth, FCC  
Brian Marenco, FCC  
Jane Jackson, FCC  
Margaret Wiener, FCC  
Gary Michaels, FCC  
Paul Murray, FCC  
Jeff Cohen, FCC