

October 24, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch
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, WT Docket No. 12-40; RM-11510

Dear Ms. Dortch:

On October 22 and 23, 2014, Jeanine Poltronieri of AT&T, Brian Josef of CTIA – The Wireless Association® (“CTIA”), Peter Connolly of Holland & Knight LLP representing US Cellular, Jill Canfield of NTCA – The Rural Broadband Association, and Leora Hochstein of Verizon, met separately with Renee Gregory of the Office of Chairman Tom Wheeler, David Goldman of the Office of Commissioner Jessica Rosenworcel, Brendan Carr of the Office of Commissioner Ajit Pai, and Louis Peraertz and Nellie Foosaner of the Office of Commissioner Mignon Clyburn (Ms. Canfield did not attend the meeting with Commissioner Clyburn’s staff).

During the meeting, the parties indicated their support for prompt consideration and adoption of the *Report and Order and Further Notice of Proposed Rulemaking* on circulation in the above-captioned proceeding. Consistent with their prior advocacy, the parties stressed the importance of the expeditious conversion of current site-based cellular coverage areas to geographic market areas based on each licensee’s currently-authorized Cellular Geographic Service Area (“CGSA”). The parties noted that adopting this proposal will immediately reduce the administrative burden on both licensees and Commission staff, without prejudicing any party or the public. The parties also highlighted the benefits of bringing cellular licensing into greater harmony with the more flexible licensing schemes used in other frequency bands used for the provision of mobile services.

In addition, the parties noted that the Commission also is adopting a *Further Notice of Proposed Rulemaking* to consider further reforms to cellular licensing, including proposals relating to power spectral density limits. The parties explained that carriers are beginning to deploy LTE network technologies in cellular spectrum, making prompt resolution of these issues particularly urgent. The parties emphasized that timely action on the *Further Notice* by the Commission is particularly warranted in light of its stated desire to remove obstacles to mobile broadband deployment.

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: Renee Gregory
David Goldman
Brendan Carr
Louis Peraertz
Nellie Foosaner