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July 1, 2004

**VIA ELECTRONIC FILING**

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

Re: *Notice of Ex Parte Presentation*
*WT Docket Nos. 02-381, 01-14, 03-202*

Dear Ms. Dortch:

On June 30 and July 1, 2004, the undersigned, on behalf of Dobson Communications Corporation ("Dobson"), had separate telephone conversations with Jennifer Manner, Senior Counsel, Office of Commissioner Kathleen Abernathy, Sam Feder, Legal Advisor, Office of Commissioner Kevin Martin, and Anne Perkins, Special Assistant, Office of Commissioner Jonathan Adelstein, and left voice mail messages for Sheryl Wilkerson, Legal Advisor, Office of Chairman Michael Powell, and Paul Margie, Legal Advisor, Office of Commissioner Michael Copps, with respect to the *Rural NPRM* proceeding referenced above.

I reiterated several points Dobson made in its comments submitted in response to the *Rural NPRM.* In particular, Dobson noted that current marketplace forces are producing a generally competitive environment for spectrum-based services in rural areas. Carriers like Dobson that focus on rural service are subject to the pressures of the competitive nationwide marketplace and are committed to providing rural wireless consumers with equivalent calling plans and options as their urban counterparts. Indeed, as the attached recent press article demonstrates, Dobson is investing in network infrastructure to provide rural consumers with high quality service and "a reliable and economical mobile broadband access solution."

Dobson urged the Commission to use the opportunity afforded by this proceeding to repeal the cellular cross-interest rule. This rule's continued application in RSAs impedes investment in wireless carriers that serve rural areas. Dobson also expressed its opposition to several proposals in the *Rural NPRM,* including the "use it or lose it" licensing model and the

post-renewal construction requirements proposal. These proposals would unnecessarily inject uncertainty into the wireless industry. Instead, before imposing new regulations, the Commission should allow time for its secondary markets initiative to develop as a means of promoting spectrum opportunities in rural areas.

Please contact the undersigned if you have any questions.

Respectfully submitted,

Adam D. Krinsky

Attachment

cc: Sheryl Wilkerson
Jennifer Manner
Paul Margie
Sam Feder
Barry Ohlson
Anne Perkins

**Breaking News**
RCR News

## Dobson orders broadband base stations from Alcatel

June 30, 2004 1:49 PM EST

DALLAS—Dobson Communications Corp. placed an order with Alcatel for the provisioning and deployment of a broadband software-defined base station solution in Michigan, which Alcatel said would use GSM frequencies to link several base stations together.

The solution is based on Airnet Communications Corp.'s AdaptaCell 4000 base stations and Airsite 3000 Backhaul-Free base stations and include Alcatel 1620 and 1631 digital cross connect products. Alcatel added that the solution would reduce Dobson's real-estate expenditures since the base stations can be mounted on poles.

"Our objective is to provide all our rural and metropolitan subscribers with a reliable and economical mobile broadband access solution," said Tim Duffy, senior vice president and chief technical officer at Dobson. "With the Alcatel solution, we expect to benefit from a reliable and cost-effective solution that can be deployed quickly in our rural and highway areas, for the direct benefit of our customers."

Dobson recently announced the completion of a $28 million acquisition of northern Michigan wireless operator NPI-Omnipoint Wireless L.L.C., which owned PCS licenses covering 1.2 million potential customers and had built a GSM-based network covering 1 million pops and serving 35,000 subscribers. Dobson noted that it plans to expand the coverage and upgrade the network, including adding GPRS data services.