

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
WORLDCALL INTERCONNECT, INC.	)	
a/k/a EVOLVE BROADBAND,	)	
Complainant	)	File No. EB-14-MD-011
	)	
v.	)	
	)	
AT&T MOBILITY LLC,	)	
Defendant	)	

**NOTICE OF FILING**

On December 18, 2014, the Commission released an Agreed Order directing, among other things, that AT&T Mobility LLC (“AT&T”) (i) notify its counterparties that Worldcall Interconnect, Inc. (“WCX”) had requested production of AT&T’s data roaming agreements and (ii) file in this proceeding copies of any emails submitted in response to that notification. On the evening of December 22, 2014, AT&T received the attached emails objecting to the production of the data roaming agreements identified in the email. Consistent with its obligation under the Agreed Order, AT&T is submitting this Notice of Filing attaching the two emails it received.

Dated: December 23, 2014

Respectfully submitted,

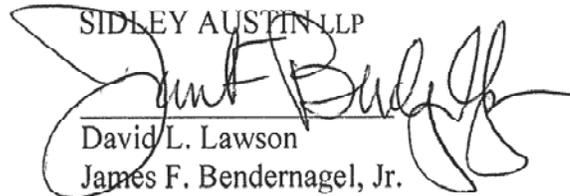
AT&T MOBILITY LLC

Steve Klimacek  
Kelly Romich  
1025 Lenox Park Blvd.  
Atlanta, GA 30319  
Telephone: (404) 986-9174

AT&T INC.

Michael P. Goggin  
1120 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
Telephone: (202) 457-2055

SIDLEY AUSTIN LLP

A large, stylized handwritten signature in black ink, appearing to read "James F. Bendernagel, Jr.", is written over a horizontal line.

David L. Lawson  
James F. Bendernagel, Jr.

Paul Zidlicky  
Thomas E. Ross  
1501 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 736-8000

# **ATTACHMENTS**

**From:** Ed King [<mailto:edking@cellprop.com>]

**Sent:** Monday, December 22, 2014 06:46 PM Central Standard Time

**To:** [lisa.boehley@fcc.gov](mailto:lisa.boehley@fcc.gov) <[lisa.boehley@fcc.gov](mailto:lisa.boehley@fcc.gov)>; [lisa.saks@fcc.gov](mailto:lisa.saks@fcc.gov) <[lisa.saks@fcc.gov](mailto:lisa.saks@fcc.gov)>; [sandra.gray-fields@fcc.gov](mailto:sandra.gray-fields@fcc.gov) <[sandra.gray-fields@fcc.gov](mailto:sandra.gray-fields@fcc.gov)>

**Cc:** Bendernagel, James F.; [henry@dotlaw.bizon](mailto:henry@dotlaw.bizon) <[henry@dotlaw.bizon](mailto:henry@dotlaw.bizon)>

**Subject:** Worldcall Interconnect, Inc. v. AT&T Mobility LLC, File No. EB-14-MD-011

FCC Enforcement Staff:

Cellular Properties, Inc. objects to the production of the roaming agreement and/or amendments between our company and AT&T. The roaming agreement in effect today is titled *Domestic GSM/UMTS Roaming Agreement* and is dated July 1, 2012. The amendment to which we also object to the production of is the *First Amendment to the Domestic GSM/UMTS Roaming Agreement* and is dated November 23, 2014.

The basis for our objection is that the disclosure of the terms of our agreement provides Worldcall Interconnect, Inc. with the potential of a distinct negotiation advantage not afforded to us or any other wireless carrier when we were negotiating rates with AT&T. Further, if our company is ever approached by Worldcall Interconnect in the future to secure a roaming agreement, we will enter negotiations at a disadvantage and be unable to set rates that are more commensurate with what supply and demand would dictate.

Finally, there is no guarantee that the handling of the Agreement under the proposed "Highly Confidential" terms will prevent the economic details from being leaked to Worldcall Interconnect, Inc. or any other party. Cellular Properties, Inc. entered into the Agreement with AT&T with the intent to abide by the terms of non-disclosure contained therein and respectfully requests that the Commission not allow the production of said Agreement to occur.

If the Commission's staff needs any further information from our company, please contact me via e-mail at [edking@cellprop.com](mailto:edking@cellprop.com) or by phone at (615) 777-7799.

Sincerely,

Edward King  
Chief Financial Officer  
Cellular Properties, Inc.

**From:** Ed King [<mailto:edking@cellprop.com>]  
**Sent:** Monday, December 22, 2014 7:57 PM  
**To:** [henry@dotlaw.biz](mailto:henry@dotlaw.biz)  
**Cc:** Bendernagel, James F.  
**Subject:** FW: Worldcall Interconnect, Inc. v. AT&T Mobility LLC, File No. EB-14-MD-011

Mr. Henry,

The order from the Commission included a typo for your e-mail address. Below is our objection submitted to Commission's staff just a few minutes ago.

Regards,

Ed King

**From:** Ed King <[edking@cellprop.com](mailto:edking@cellprop.com)>  
**Date:** Monday, December 22, 2014 at 6:46 PM  
**To:** "[lisa.boehley@fcc.gov](mailto:lisa.boehley@fcc.gov)" <[lisa.boehley@fcc.gov](mailto:lisa.boehley@fcc.gov)>, "[lisa.saks@fcc.gov](mailto:lisa.saks@fcc.gov)" <[lisa.saks@fcc.gov](mailto:lisa.saks@fcc.gov)>, "[sandra.gray-fields@fcc.gov](mailto:sandra.gray-fields@fcc.gov)" <[sandra.gray-fields@fcc.gov](mailto:sandra.gray-fields@fcc.gov)>  
**Cc:** "[jbendernagel@sidley.com](mailto:jbendernagel@sidley.com)" <[jbendernagel@sidley.com](mailto:jbendernagel@sidley.com)>, "[henry@dotlaw.bizon](mailto:henry@dotlaw.bizon)" <[henry@dotlaw.bizon](mailto:henry@dotlaw.bizon)>  
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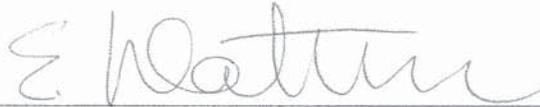
Edward King  
Chief Financial Officer  
Cellular Properties, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2014, I caused the foregoing Notice of Filing to be served on Complainant and provided to the Enforcement Bureau via electronic mail.

W. Scott McCollough  
Matthew A. Henry  
McCullough Henry PC  
1250 South Capital of Texas Highway  
Building 2, Suite 235  
West Lake Hills, TX 78746

Lisa Saks  
Lisa Boehley  
Markets Disputes Resolution Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554



Emily C. Watkins  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, DC 20005  
(202) 736-8000