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September 30, 2014

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

**Re:** *NTCH, Inc. v. Cellco Partnership d/b/a Verizon Wireless*  
File No. EB-13-MD-006

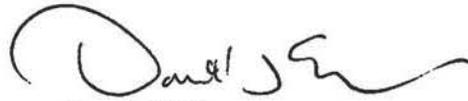
Dear Ms. Dortch:

Pursuant to the Commission's July 9, 2014 letter ruling in this proceeding and Section 1.732(h) of the Commission's rules, NTCH, Inc. hereby advises the Commission of two additional issues which Verizon has refused to acknowledge as issues to be resolved in the Joint Filing required by the staff. These are:

1. If MVNO services are functionally similar to roaming services, whether low MVNO rates (i) disincent nationwide MVNO carriers to build out their own networks and (ii) constitute an anti-competitive form of predatory pricing.
2. Whether international roaming rates entered into by Verizon with other carriers are relevant to determining whether voice roaming rates offered by Verizon are just and reasonable and whether data roaming rates offered by Verizon are commercially reasonable.

Since there is not agreement between the parties on these issues, we would deem them to be disputed, along with the other issues noted in the Joint Submission.

Yours truly,



Donald J. Evans  
Counsel for NTCH, Inc.

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cc: Andre J. LaChance, Esq.