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April 22, 2015

FILED ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Applications of AT&T Inc., Plateau Telecommunications, Inc., E.N.M.R. Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas RSA 4 Limited Partnership (Collectively, “Plateau”) for Consent to Assign Licenses and Authorizations, WT Docket No. 14-144***
WRITTEN EX PARTE COMMUNICATION

Dear Ms. Dortch:

On April 14, 2015, AT&T Inc. (“AT&T”) submitted several letters reporting on meetings with Commission staff and urging prompt review of, and action in, the above-referenced proceeding. AT&T asserted that the proposed transaction will generate public interest benefits “without any harm to competition.”^{1/} Those allegations are inaccurate and the Commission should, as T-Mobile USA, Inc. (“T-Mobile”) requested in its Petition for Conditions (“Petition”), only approve the transaction if it requires AT&T to adhere to Plateau’s current roaming agreement with T-Mobile, including Plateau’s practice of permitting T-Mobile to roam in areas comprised of one or a few cell sites.^{2/}

T-Mobile’s Petition pointed out that it has a long-standing roaming agreement with Plateau and that once this transaction is consummated, the Plateau system would be integrated into AT&T’s network, subjecting T-Mobile to AT&T’s less favorable roaming practices in the Plateau service area.^{3/} AT&T continues to use its market position to only offer roaming arrangements that raise T-Mobile’s costs and degrade its customers’ experience, harming competition. In this transaction, it will mean T-Mobile will lose its ability to have its customers roam in only the limited geographic area covered by its roaming agreement with Plateau, resulting in either significant and unnecessary home roaming by T-Mobile or the complete denial of T-Mobile’s

^{1/} See, e.g., Letter from Joan Marsh, Vice President – Federal Regulatory, AT&T Inc., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 14-144, at 1 (filed Apr. 14, 2015).

^{2/} See T-Mobile USA, Inc. Petition for Conditions, WT Docket No. 14-144 (filed Oct. 17, 2014).

^{3/} See *id.* at 3-7.

ability to roam in the areas covered by the Plateau agreement. As a result, T-Mobile's customers may lose coverage or full system capabilities in the parts of the Plateau coverage area where they could formerly roam. T-Mobile's request would prevent a non-speculative, transaction-specific harm and preserve the *status quo*, consistent with past Commission practice. T-Mobile's requested condition would impose no meaningful burden on AT&T and would provide significant benefit to T-Mobile and its customers.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being submitted in the docket of this proceeding. Should you have any questions, please contact the undersigned directly.

Respectfully submitted,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President, Federal Regulatory Affairs

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