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FOUNDED 1866

December 4, 2015

By Hand Delivery and Electronic Filing

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20054

Re: AT&T Mobility LLC v. Iowa Wireless Services, LLC, File No. EB-15-MD-007

Dear Ms. Dortch:

Pursuant to the schedule set forth in the letter ruling issued on November 17, 2015 in this proceeding, AT&T Mobility LLC (“AT&T”) and Iowa Wireless Services, LLC (“iWireless”) (together, the “Parties”) submit for filing a Joint Status Report. The Joint Status Report includes confidential information. Consistent with the Commission’s regulations, the Parties are filing electronically a **Public Version** of the submission from which all confidential information has been redacted. The Parties are also filing by hand with the Secretary’s office a hard copy of the **Confidential Version** of the submission, along with a copy to be stamped as filed. The Parties are also providing a copy of the Joint Status Report by email to Commission Staff.

The Parties request that portions of the Joint Status Report be treated as confidential pursuant to the Commission’s rules and not be subject to public inspection. As explained in greater detail below, certain portions of the submission contain confidential information that, if subject to public disclosure, would cause them significant commercial and competitive harm. The Parties’ request satisfies the standards set forth in Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459.

In accordance with Section 0.459(b) and in support of its request, the Parties provide the following information:

Statement Pursuant to 47 C.F.R. § 0.459(b)

(1) Identification of Confidential Materials: The confidential information is commercially sensitive information related to the confidential roaming agreement between the Parties. The information is identified as confidential when it appears within the submission, and pages containing confidential information have been marked: “**DO NOT RELEASE – NOT**

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FOR INCLUSION IN THE PUBLIC RECORD.” The confidential materials are being provided pursuant to a Protective Order that has been presented to Iowa Wireless Service, LLC (“iWireless”) by AT&T on August 15, 2015 and are marked consistent with the provisions of that Protective Order.

(2) Identification of the Circumstances Giving Rise to the Submission: The Parties submit the Joint Status Report in compliance with the letter ruling dated November 17, 2015.

(3) Degree to Which the Information is Commercial or Financial: As identified above, the information relates to the confidential roaming agreement between with Parties. It is not the type of information that the Parties would make publicly available in the ordinary course of business

(4) Degree to Which the Information Concerns a Service Subject to Competition: The information that the Parties seek to protect is related to the provision of mobile wireless services. The mobile wireless industry is highly competitive.

(5) How Disclosure of the Information Could Result in Substantial Competitive Harm: Disclosure of the confidential information would result in substantial competitive harm because it would provide a competitive advantage for counterparties in future negotiations of roaming agreements with the Parties.

(6) Measures Taken to Prevent Disclosure: The Parties treat the information subject to this request as confidential and do not publicly disclose it. The roaming agreement between the Parties contains a confidentiality clause pursuant to which they are obligated to protect such information from disclosure.

(7) Public Availability and Third Party Disclosure: The designated information has not been made available to the public and has not been provided to third parties except pursuant to a confidentiality agreement.

(8) Justification of the Requested Duration of Non-Disclosure: The designated information should never be released for public inspection. It contains commercially sensitive information that the Parties do not make publicly available in the ordinary course of business and the disclosure of which could adversely affect their competitive position.



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Please contact me if you have any questions regarding this matter.

Sincerely,

/s/ James F. Bendernagel, Jr.

James F. Bendernagel, Jr.

Enclosures

cc: Carl Northrop, Counsel for Defendant
Lisa Saks, FCC
Christopher Killion, FCC
Rosemary McEnery, FCC