



**PUBLIC VERSION**

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December 4, 2015

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**VIA ECFS**

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

Re: AT&T Mobility LLC v. Iowa Wireless Services, LLC  
Proceeding No. 15-259, File No. EB-15-MD-007

Dear Ms. Dortch:

Iowa Wireless Services, LLC (“iWireless”) has submitted for filing its Best and Final Offer setting forth its proposed terms to govern the iWireless and AT&T roaming relationship on a going forward basis (“BAFO”).

iWireless’ BAFO includes confidential information, and therefore iWireless is filing electronically only this transmittal letter, which contains no confidential information. iWireless is concurrently filing by hand with the Secretary’s Office a hard copy of the Confidential Version of the BAFO.

iWireless requests that portions of the BAFO be treated as confidential, and not subject to public inspection, pursuant to the Commission’s rules. As noted below, certain portions of the BAFO contain confidential information that, if subject to public exposure, would cause significant commercial and competitive harm to iWireless. iWireless’ request satisfies the standards set forth in Sections 0.457 and 0.459 of the Commission’s rules.

In accordance with the above, iWireless submits the following:

(1) Identification of Confidential Materials: The confidential information is commercially sensitive information (including information regarding rates, volumes, and terms and conditions of service, and the negotiations thereof) related to iWireless’ provision of mobile wireless services in connection with roaming. The information is identified as confidential when it appears within the submission, and pages containing confidential information have been marked: **“DO NOT RELEASE- NOT FOR PUBLIC INSPECTION.”**

(2) Identification of the Circumstances Giving Rise to the Submission: The confidential information is being provided to support the iWireless BAFO.



(3) Degree to Which the Information is Commercial or Financial: The confidential information is both commercial and financial. As mentioned above, it includes information regarding rates, volumes, and terms and conditions of service, and the negotiations thereof, related to iWireless' provision of mobile wireless services in connection with roaming. None of this information is the type that iWireless makes publicly available in the ordinary course of business.

(4) Degree to Which the Information Concerns a Service Subject to Competition: The confidential information that iWireless seeks to protect is related to its 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 iWireless' counterparties in future negotiations of roaming agreements.

(6) Measures Taken to Prevent Disclosure: iWireless treats the information subject to this request as confidential and does not publicly disclose it. In fact, iWireless is obligated pursuant to the terms of its roaming agreements to keep the agreements themselves and related information confidential.

(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 iWireless does not make publicly available in the ordinary course of business and the disclosure of which could adversely affect iWireless' competitive position.

iWireless is also providing copies of the BAFO by email and via hand-delivery to Enforcement Bureau Staff. AT&T's counsel has been provided a copy of the BAFO via email as well.



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Sincerely,

Carl W. Northrop  
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC