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June 9, 2016

Via Hand Delivery and Electronic Filing

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

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

Dear Ms. Dortch:

AT&T Mobility LLC (“AT&T”) submits for filing its Opposition to the Motion for Clarification that was filed by Worldcall Interconnect Inc. (“WCX”) on June 6, 2016. AT&T’s response includes Confidential Information submitted pursuant to 47 C.F.R. §1.731 and the Protective Order entered in this proceeding.

AT&T is delivering by hand an original and three paper copies of the **Confidential Version** of its Opposition. AT&T is also submitting via the Commission’s Electronic Comment Filing System the **Public Version** of its Opposition from which all confidential information has been redacted,

AT&T requests that portions of this submission 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 Opposition contain confidential information that, if subject to public disclosure, would cause significant commercial and competitive harm to AT&T. The information is also related to continued settlement discussions between the parties and therefore deemed confidential pursuant to the Enforcement Bureau’s letter dated March 31, 2015 setting forth the procedures for mediation in this proceeding. AT&T’s request satisfies the standards in Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459. It is also consistent with the provisions of the Protective Order entered in this proceeding.

In accordance with Section 0.459(b) and in support of its request, AT&T provides the following information:

(1) Identification of Confidential Materials: The confidential information relates to the parties’ settlement discussions and their negotiations with respect to the terms and conditions of roaming.

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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 INCLUSION IN THE PUBLIC RECORD” and “Confidential Information included pursuant to Protective Order in Worldcall Interconnect, Inc. v. AT&T Mobility LLC, File No. EB-14-MD-011” consistent with the October 9, 2014 letter order and the Protective Order entered in this proceeding.

(2) Identification of the Circumstances Giving Rise to the Submission: The confidential information is being provided as part of AT&T’s Opposition to the Motion for Clarification filed by WCX. The information is relevant to the Commission’s consideration of the Motion for Clarification.

(3) Degree to Which the Information is Commercial or Financial: The confidential information is commercially sensitive. As identified above, it includes information related to settlement discussions regarding the terms and conditions of roaming. None of this information is the type that AT&T 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 AT&T 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 regarding AT&T’s negotiation of roaming arrangements with WCX would result in substantial competitive harm because it would give competitors a significant advantage in future roaming negotiations with AT&T.

(6) Measures Taken to Prevent Disclosure: AT&T treats the information subject to this request as confidential and does not publicly disclose it. The Enforcement Bureau’s March 31, 2015 letter also directs that this information, because it relates to settlement discussions, be filed as confidential pursuant to the Protective Order as AT&T has done.

(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 AT&T does not make publicly available in the ordinary course of business and the disclosure of which could adversely affect AT&T’s competitive position.



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AT&T is serving copies of both versions of its Opposition on WCX's counsel electronically as well as providing courtesy electronic copies to the Commission's Enforcement Bureau. Lastly, AT&T has enclosed an extra paper copy of the Confidential Version to be date-stamped and returned.

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

Sincerely,

/s/ James F. Bendernagel, Jr.

James F. Bendernagel, Jr.

Enclosures

cc: W. Scott McCullough, Counsel for Defendants
Matthew A. Henry, Counsel for Defendants
Lisa Saks, FCC
Lisa Boehley, FCC