

**Electronically Filed**

September 17, 2004

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room  
Washington, DC 20554

Re: Ex Parte Filing: WT Docket No. 04-70:

Dear Ms. Dortch:

Recently, I visited the offices of various individuals at the FCC with Terry Addington, President of First Cellular of Southern Illinois, in order to discuss the benefits of the Cingular/AT&T Wireless merger. During this visit we met with John Muleta, Chief of the Wireless Bureau, Thomas Navin and his colleagues in the Wireline Competition Bureau's Competition Policy Division (William Dever (Asst. Chief), Julie Veach (Asst. Chief), Michelle Carey (Chief), Pam Megna (Attorney Advisor), and Rodger Woock), Barry Ohlson of Commissioner Adelstein's staff, and Commissioner Michael Copps and his staff.

In the above noted meetings we discussed the following points:

Highland Cellular is a rural carrier serving some of the most rural areas in southern West Virginia and Virginia. In the past we have faced and continue to face many challenges, including slow growth in GSM roaming minutes, delayed vendor rollouts for GSM equipment at 850 mhz and high costs in deploying network equipment.

The combination of Cingular and AT&T Wireless creates a strong national platform for GSM at both 1900 mhz and 850 mhz. This will insure availability of the same equipment at 850 and 1900 at the same time. As a result Highland will be able to offer our customers in southern WV & VA the same products which are available to customers throughout the country.

Furthermore, a successful merger between these two entities has the potential to strengthen Highland's GSM roaming business. As the merged entity raises the level of competition, Highland expects this to translate to more minutes on Highland's GSM network.

Most importantly, there are also many areas in the country in which GSM customers are unable to use their handsets. These customers are actually experiencing

degradation to their service footprint as it compares to the TDMA service footprint. This negatively impacts Highland's customers locally and nationwide.

Highland and a group of other small carriers are discussing ways to solve this and other challenges through a joint partnership. Cooperative purchasing will lower the cost for Highland to construct some of these very rural areas, bringing more coverage to rural America and long term roaming agreements will aid Highland's confidence when raising capital.

As a result of the above and other points discussed, we encouraged Commission members and staff to rapidly approve the merger.

Pursuant to the Commission's Rule 1.1206(b), this letter is being filed electronically.

Sincerely yours,

Tom Attar  
Vice President  
Highland Cellular