

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of)	
)	
RURAL CELLULAR CORP.,)	
TRANSFEROR,)	WT Docket No. 07-208
)	
and)	
)	
CELLCO PARTNERSHIP D/B/A)	
VERIZON WIRELESS, TRANSFEREE)	
)	
for Consent to the Transfer of Control of)	
Commission Licenses and Authorizations)	
Pursuant to Sections 214 and 310(d) of the)	
Communications Act)	

**PETITION TO ADOPT CONDITIONS TO
AUTHORIZATIONS AND LICENSES**

Pursuant to Section 1.41 of the Federal Communications Commission's ("FCC" or "Commission") rules,¹ the Department of Homeland Security ("DHS") respectfully submits this Petition to Adopt Conditions to Authorizations and Licenses ("Petition"). Through this Petition, DHS advises the Commission that it has no objection to the Commission granting its consent in the above-referenced proceeding, provided that the Commission condition the grant on compliance by Cellco Partnership ("Cellco") with the terms contained in their March 27 letter to Stewart Baker (the "Letter") attached hereto as Exhibit 1.

In its application, Cellco acknowledged that the above-referenced proceeding is governed by the terms of the December 14, 1999 Agreement between Cellco and its parent corporations on one hand, and the U.S. Department of Justice ("DOJ"), U.S. Department of Defense ("DOD),

¹ 47 C.F.R. § 1.41.

and Federal Bureau of Investigation (“FBI”) on the other. The attached Letter incorporates the terms of the December 14, 1999 Agreement by reference and creates a new agreement by Cellco and its parent corporations to confer upon DHS identical rights and benefits conferred to DOJ, DOD and FBI, and as such, DHS shall conduct itself as a U.S. government party under that Agreement. This Petition is submitted by DHS in consideration of the agreements made in the attached Letter.

As the Commission is aware, DHS has taken the position that its ability to satisfy its obligations to protect the national security, enforce the laws, and preserve the safety of the public could be impaired by transactions in which foreign entities will own or operate a part of the U.S. telecommunications system, or in which foreign-located facilities will be used to provide domestic telecommunications services to U.S. customers. DHS has concluded that the commitments set forth in the Letter will help ensure that DHS and other entities with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed in a legal, secure, and confidential manner to satisfy these responsibilities.

Accordingly, DHS, with the concurrence of DOJ and FBI, advises the Commission that it hereby withdraws its request to defer action of November 9, 2007, and that it has no objection to the Commission granting the above-referenced application, provided that the Commission conditions its consent on Cellco Partnership’s compliance with the commitments set forth in the Letter.

Respectfully submitted,

/s/ Charles M. Steele

Charles M. Steele
Chief of Staff
National Security Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

/s/ Stewart A. Baker

Stewart A. Baker
Assistant Secretary for Policy
U.S. Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, DC 20528

April 2, 2008

Exhibit 1

Steven E. Zipperstein
General Counsel



March 27, 2008

Verizon Wireless
One Verizon Way
VC43E024
Basking Ridge, NJ 07920-1097

Phone 908 559-7390
Fax 908 559-7387
steven.zipperstein@VerizonWireless.com

BY E-MAIL.

Mr. Stewart Baker
Assistant Secretary of Policy
U.S. Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20528

Re: New Agreement to Confer on the U.S. Department of Homeland Security Identical Rights and Benefits as Obligated to other U.S. Government Agencies in the 1999 National Security Agreement

Dear Mr. Baker:

Verizon Communications Inc. ("Verizon"), a Delaware corporation, Vodafone Group Plc ("Vodafone"), a United Kingdom public limited company, and Cellco Partnership d/b/a Verizon Wireless ("Cellco Partnership" or "Verizon Wireless"), a Delaware corporation, hereby agree to confer on the U.S. Department of Homeland Security ("DHS") the same rights and benefits accorded to the U.S. government agencies in the Agreement, as amended, dated December 14, 1999 between Bell Atlantic Corporation ("Bell Atlantic"), Vodafone and Cellco Partnership, on the one hand, and the U.S. Department of Defense ("DOD"), the U.S. Department of Justice ("DOJ") and the Federal Bureau of Investigation ("FBI") on the other (the "1999 Agreement").

In April 2000, Vodafone and Bell Atlantic Corp. entered into a joint venture, known as Cellco Partnership, effectively combining their respective U.S. wireless networks. In June 2000, Verizon became the successor in interest to Bell Atlantic. Verizon currently owns a controlling 55% interest in Verizon Wireless, and Vodafone indirectly owns the remaining 45% interest through two of its indirect, wholly-owned American subsidiaries.

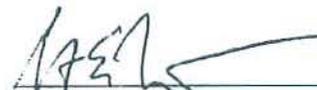
Recognizing that the *Homeland Security Act of 2002* grants DHS non-exclusive but prominent authority within the Executive Branch over U.S. national security and public safety, Verizon, Vodafone and Verizon Wireless agree that DHS should be accorded identical rights and benefits given to DOD, DOJ and the FBI in the 1999 Agreement. By its terms, the 1999 Agreement intends to ensure the security of the U.S. telecommunications system, an essential component of U.S. national security and public safety, and therefore, the 1999 Agreement is within DHS' purview.

This letter does not constitute a modification, assignment, delegation or novation of any of the original parties' rights and duties. Rather, this letter creates an agreement on the part of Verizon, Vodafone and Cellco Partnership to vest DHS with the same rights and benefits accorded to DOD, DOJ and FBI under the 1999 Agreement, and as that Agreement may be amended by those parties. Accordingly, the terms of the 1999 Agreement, as amended, are hereby incorporated by reference, and are effective as if DHS were an original party-beneficiary to that Agreement.

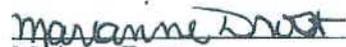
Verizon, Vodafone and Verizon Wireless consider themselves to be in full compliance with the 1999 Agreement. Verizon Wireless will copy all future notices required under the 1999 Agreement, as amended, to DOJ, DOD and the FBI, adding DHS as an additional recipient. As per instructions from DHS, Verizon Wireless will send any notices by one or more methods to the following contact point:

U.S. Department of Homeland Security
Assistant Secretary for Policy
ATTN: Office of Foreign Finance and Investment Policy
3801 Nebraska Avenue NW
Washington, DC 20528
ip-fcc@dhs.gov

Sincerely,



Steven E. Zipperstein
Cellco Partnership d/b/a Verizon Wireless



Marianne Drost
Verizon Communications Inc.



Stephen Scott
Vodafone Group Plc

cc:

Joanne Ongman, U.S. Department of Justice

Jon Pifer, Federal Bureau of Investigation

Hillary Morgan, U.S. Department of Defense (DISA)