

**Before the
Federal Communications Commission
Washington, DC 20554**

In re Applications of)	
)	
ATLANTIS HOLDINGS LLC, Transferor,)	
)	
and)	WT Docket No. 08-95
)	
CELLCO PARTNERSHIP D/B/A)	
VERIZON WIRELESS, Transferee)	
)	
for Consent to the Transfer of Control of)	File Nos. 0003463892, <i>et al.</i>
Commission Licenses and Authorizations)	
Pursuant to Sections 214 and 310(d) of the)	
Communications Act)	
)	

MOTION FOR EXTENSION OF TIME

The Rural Telecommunications Group, Inc. (“RTG”), by its attorneys and pursuant to 47 C.F.R. §§ 1.46 and 1.939 of the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), hereby requests that the FCC extend the pleading cycle established in the above-captioned proceeding for an additional seven (7) days in order to give interested parties sufficient time to analyze and respond to new information submitted by the applicants yesterday in this proceeding in the form of an *ex parte* filing.¹ The *ex parte* raises new and substantial matters not contained in the original transfer of control applications put out for public comment on June 25, 2008.² RTG respectfully requests that the FCC issue a revised

¹ *Ex Parte* Letter from John T. Scott, III to Marlene H. Dortch dated July 22, 2008 (“*Ex Parte* Letter”).

² FCC Public Notice, DA 08-1481, *Verizon Wireless and Atlantis Holdings LLC Seek FCC Consent to Transfer Licenses, Spectrum Manager and De Facto Transfer Leasing Arrangements, and Authorizations, and Request a Declaratory Ruling on Foreign Ownership, WT Docket No. 08-95, Pleading Cycle Established* (released June 25, 2008) (“Public Notice”).

pleading cycle that extends the time for filing Petitions to August 1, 2008, Oppositions to August 11, 2008 and Replies to August 18, 2008.

RTG is a 501(c)(6) trade association whose members consist of rural and small wireless carriers and licensees that depend upon the availability of spectrum, handsets, universal service support and roaming services to attract and serve their subscribers. As such, RTG through its members, is a real party in interest in the above-captioned proceeding. On July 22, 2008, a mere three days before the due date established in the Public Notice for filing petitions, Verizon Wireless filed its *Ex Parte* Letter in which it denominated 85 markets in which it claims to have offered to divest wireless properties as a condition of obtaining consent to its proposed merger with Alltel. Furthermore, in the *Ex Parte* Letter Verizon makes two specific commitments to regional and small wireless providers regarding their existing roaming arrangements with Verizon and/or Alltel. These proposals were not contained in the Applicants' transfer of control applications.

The information contained in the *Ex Parte* Letter is highly relevant to the determination of whether the Commission should grant its consent to the proposed merger and on what conditions should be placed on any such merger consent. Given that this information did not become publicly available until two short days before the petition filing deadline established in the Public Notice, good cause exists for the Commission to waive the 30 day requirement for the filing of petitions set forth in section 1.939(a)(2) of its rules to give interested parties, such as RTG sufficient time to analyze and respond if necessary to this new information. Alternatively, to the extent that the *Ex Parte* Letter represents a binding offer to divest the properties therein and/or a binding commitment by Verizon and Alltel to unilaterally modify their existing roaming agreements with individual carriers, the *Ex Parte* Letter should be considered a major

CERTIFICATE OF SERVICE

I, Colleen von Hollen, of Bennet & Bennet, PLLC, 4350 East West Highway, Suite 201, Bethesda, MD 20814, hereby certify that a copy of the foregoing Motion for Extension of Time of the Rural Telecommunications Group, Inc. was served on July 23, 2008, by first-class United States mail, postage prepaid, unless indicated otherwise, on those listed below:

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/s/ Colleen von Hollen

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