

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

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)	
)	

**COMMENTS IN SUPPORT OF
RTG MOTION FOR EXTENSION OF TIME**

The Law Firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, on behalf of its clients interested in the above-captioned proceeding, submits these comments in support of the Motion for Extension of Time filed yesterday by the Rural Telecommunications Group, Inc. ("RTG") in the above matter.¹ In its Motion, RTG requested that the Federal Communications Commission ("FCC" or "Commission") 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 in this proceeding by the Verizon Wireless on July 22, 2008 in the form of an *ex parte* filing.² As RTG correctly observes, the *Ex Parte* Letter raises new and substantial matters not contained in the original transfer of control applications.

¹ Several of the firm's clients are in the process of preparing to comment on the proposed merger, with regard to a variety of issues.

² *Ex Parte* Letter from John T. Scott, III to Marlene H. Dortch dated July 22, 2008 ("*Ex Parte* Letter").

The information contained in the *Ex Parte* Letter – including somewhat cryptic assertions about possible divestiture concessions and roaming agreement modifications -- is highly relevant to the determination of whether the Commission should grant its consent to the proposed merger and what conditions should be placed on any such merger consent. The applicants in the above captioned matter assert in their joint July 24, 2008 Opposition³ that their last minute *Ex Parte* Letter “merely reduces the potential issues to be addressed” in any petitions filed in this matter, and that petitioners can make any relevant points about the *Ex Parte* Letter in their reply comments. However, the matters discussed very briefly in the *Ex Parte* Letter – including divestiture and roaming issues – go to the heart of concerns that will be raised by many rural carriers, including many Blooston clients. We are encouraged that the *Ex Parte* Letter has opened the door to productive avenues of discussion about these issues. However, the Letter does not dispose of these issues, and instead is sparse enough on details that many important questions are raised by the filing. While interested parties will be able to file reply comments, the Commission’s Rules clearly contemplate that these parties be given an opportunity to develop the record by raising questions in their initial petitions, and then responding in reply comments to any answers provided by the applicants in their oppositions. Thus, while it may appear magnanimous for the applicants to offer to waive any objections to matters raised for the first time in reply comments,⁴ this approach nonetheless deprives petitioners their chance to develop the record properly.

Since RTG has requested only a brief seven (7) day extension of the pleading cycle established by the Commission, and such a brief extension will not materially delay regulatory

³ July 24, 2008 Opposition of Atlantis Holdings LLC and Celco Partnership d/b/a Verizon Wireless to Motion for Extension of Time.

⁴ Joint Opposition at p. 3.

review of the proposed merger, we agree with the National Telecommunications Cooperative Association that the public interest would be served by a grant of RTG's Motion.⁵

For the reasons discussed herein and in the RTG Motion for Extension of Time, the Commission should extend the deadline in this proceeding for filing Petitions to August 1, 2008, Oppositions to August 11, 2008 and Replies to August 18, 2008.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John A. Prendergast". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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Filed: July 24, 2008

⁵ See July 24, 2008 National Telecommunications Cooperative Association Comments in Support of RTG Motion for Extension of Time at p. 3.

CERTIFICATE OF SERVICE

I hereby certify that I am an attorney with the law offices of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP and that on July 24, 2008 I caused to be sent by electronic mail (e-mail), a copy of the foregoing "**Comments in Support of RTG Motion For Extension of Time**" to the following:

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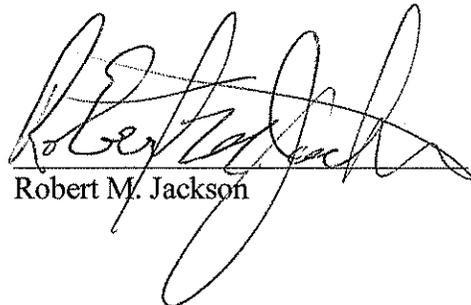
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