

**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 National Telecommunications Cooperative Association (“NTCA”), by its attorneys, submits these comments in support of the Motion for Extension of Time filed yesterday by the Rural Telecommunications Group, Inc. (“RTG”) in the above-captioned proceeding.<sup>1</sup> 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 June 22, 2008 in the form of an *ex parte*

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<sup>1</sup> NTCA is a national association representing more than 570 rural telecommunications providers. While NTCA’s members are all rural incumbent local exchange carriers, most provide their rural communities with a broad array of telecommunications services, including wireless service.

filing.<sup>2</sup> RTG correctly points out that the *Ex Parte* Letter raises new and substantial matters not contained in the original transfer of control applications put out for public comment on June 25, 2008. NTCA also agrees that 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. Verizon should not be permitted to avoid public scrutiny and comment on the substance of its divestiture and roaming proposals through the questionable procedural vehicle of an 11<sup>th</sup> hour *ex parte* filing. Given that RTG has requested only a brief seven (7) day extension of the pleading cycle established by the Commission, and that such a brief extension will not materially delay regulatory review of the proposed merger, the public interest weighs heavily in favor of granting of RTG's Motion.

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<sup>2</sup> *Ex Parte* Letter from John T. Scott, III to Marlene H. Dortch dated July 22, 2008 (“*Ex Parte* Letter”).

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,

**NATIONAL TELECOMMUNICATIONS  
COOPERATIVE ASSOCIATION**

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July 24, 2008

## CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing Comments in Support of RTG Motion for Extension of Time of the National Telecommunications Cooperative Association in WT Docket No. 08-95, DA 08-1481, was served on this 24<sup>th</sup> day of July 2008 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons:

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