



**OPASTCO**

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September 17, 2008

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: In re Applications of ATLANTIS HOLDINGS LLC, Transferor, 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  
WT Docket No. 08-95**

**Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers  
WT Docket No. 05-265**

**Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band  
WT Docket No. 07-195**

**Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands  
WT Docket No. 04-356**

***Ex Parte Notice***

On Tuesday, September 16, 2008, Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) and Carri Bennet of Bennet and Bennet, PLLC on behalf of the Rural Telecommunications Group (RTG) (collectively, the "Associations") met with Bruce Gottlieb of Commissioner Michael Copps' office to discuss the proposed merger of Verizon Wireless and ALLTEL Wireless. The Associations expressed their view that the merger has the potential to seriously harm rural consumers, and thus the Commission should thoroughly examine the many questions this transaction raises, including holding a hearing pursuant to Section 309(e).<sup>1</sup> The Associations

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<sup>1</sup> 47 U.S.C. § 309(e).

also asked that the Commission seek comment on the RTG Petition for Rulemaking related to a spectrum aggregation limit for wireless spectrum.<sup>2</sup> The Associations also asked that the Commission seek comment on the handset exclusivity Petition for Rulemaking filed by the Rural Cellular Association (RCA).<sup>3</sup> Finally, the Associations asked that the Commission license spectrum in the Advanced Wireless Services (AWS)-2 and AWS-3 band on the basis of Cellular Market Areas (CMAs) so that rural wireless carriers can realistically compete for it at auction.

Sincerely,

Brian Ford  
Regulatory Counsel  
OPASTCO

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<sup>2</sup> *Rural Telecommunications Group, Inc. Petition for Rulemaking to impose a spectrum aggregation limit on all commercial terrestrial wireless spectrum below 2.3 GHz* (fil. Jul. 16, 2008).

<sup>3</sup> *Rural Cellular Association Petition for Rulemaking regarding exclusivity arrangements between commercial wireless carriers and handset manufacturers* (fil. May 20, 2008).