



October 15, 2008

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC  
WT Docket No. 08-95**

Dear Chairman Martin:

I am the President of Operations of All West Communications, a small business and rural telephone company that provides local exchange telephone and advanced wireless services in the state of Utah. I am writing to request that the Commission delay its scheduled November 4, 2008 vote on the proposed Verizon Wireless/Alltel merger.

Verizon Wireless and Alltel together own and/or control both the cellular A- and B-Block licenses in large portions of the country, including areas in which our company is trying to provide wireline and wireless services. In states having vast rural areas, such as Georgia, Utah, and Idaho, incumbent provider status and the unique properties of 850 MHz band spectrum create a significant competitive advantage. To be sure, the proponents of this transaction have offered to divest a handful of rural properties, including properties in the states noted above, but this a meaningless gesture when one considers the low population density and marginal value of the markets offered in comparison to the more desirable rural markets they have proposed to retain.

Due to considerations of spectrum accumulation and dominant market share, the merger of Verizon Wireless and Alltel has the very real potential to injure competition and to harm small businesses and consumers in rural communities across America. Moreover, since the proposed merger was first announced, there has been a meltdown in the nation's economy. The impact of this fiscal crisis on our industry remains uncertain. However, with far less investment capital available than there was just a few months ago, small businesses and new market entrants will now face even greater challenges when seeking to compete against an entrenched incumbent that holds a cellular monopoly. The need for access to roaming services on reasonable terms and conditions, and to limit spectrum concentration and handset exclusivity arrangements, is even more important now. This Commission should delay its consideration of the Verizon/Alltel merger until its staff, and staff in the Justice Department, have had an opportunity to examine these issues in the context of profoundly changed circumstances. We have participated in extensive comments on the proposed merger, and a substantial record has been created which requires careful evaluation by the Commission.



DIGITAL VOICE



DIGITAL VIDEO



DATA SERVICE



WIRELESS



Small businesses like ours face difficult times ahead and the Commission should not rush to judgment before fully evaluating the potential impacts of this transaction. Approving this merger without carefully addressing these critical issues is not in the public interest, and will be anti-competitive and anti-consumer.

Sincerely,

A handwritten signature in black ink that reads "Tony DiStefano". The signature is fluid and cursive, with the first name "Tony" being the most prominent.

Tony DiStefano  
President/Operations  
All West Communications

cc: Commissioner Jonathan S. Adelstein  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Deborah Taylor Tate

