Public Service

October 17, 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 Public Service Communications, a small business that provides local exchange telephone and advanced wireless services in the state of Georgia. 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 on a competitive basis. 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 surrounding 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.

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,

E. Kelly Bond

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