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Computer & Communications Industry Association

BY ELECTRONIC FILING

October 27, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* filing: WTB Docket No. 08-95

Dear Ms. Dortch:

CCIA has not participated in this proceeding to date, but is writing now to share its growing concern about increasing consolidation at the top of the mobile wireless industry. Verizon's acquisition of AllTel would result in Verizon overtaking AT&T as the largest wireless carrier in the U.S., with the two largest carriers dwarfing their nearest competitors by an even larger margin. Moreover, these are the same two companies that dominate the wireline broadband access market.

Given the recent crisis in financial markets and deepening concerns about the overall economy, the barriers to new entry in telecommunications are higher than ever. These serious developments have followed closely on the heels of a disappointing incumbent sweep of the FCC's 700MHz auctions earlier this year. Even Verizon's good faith offers to sell off AllTel assets in 100 overlapping markets are worth far less to the public interest if buyers are not available.

We agree with the Public Interest Spectrum Trust that this merger presents serious market structure issues that need to be addressed. At a minimum, Verizon Wireless should agree to 1) openness conditions that promote portability of devices among wireless networks, and 2) honoring the automatic roaming rule without "home market exclusions".

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E J Black', written in a cursive style.

Edward J. Black
President & CEO
Computer and Communications Industry Association (CCIA)