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November 5, 2008

**Via E-Mail**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**RE: *High-Cost Universal Service Support, WC Docket No. 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Highland Cellular, LLC (SAC 199002) and AT&T Mobility (SAC 199009) Virginia ETC Designations***

Dear Ms. Dortch:

AT&T Inc. (“AT&T”), on behalf of its wholly-owned affiliates Highland Cellular, LLC (“Highland Cellular”) and AT&T Mobility LLC (“AT&T Mobility”), hereby informs the Commission that it intends to consolidate the above listed eligible telecommunications carrier (“ETC”) designations in Virginia.

In April 2004, Highland Cellular, LLC was designated by the Commission as an ETC in certain areas of Virginia (“Highland ETC Designation”).<sup>1</sup> On November 15, 2007, the Commission approved AT&T’s application to acquire Dobson Communications Corporation (“Dobson”), the parent corporation of Highland Cellular.<sup>2</sup> In its May 1, 2008, *CETC Cap Order*, the Commission granted AT&T Mobility’s petition to be designated as an ETC in certain areas of Virginia (“AT&T Mobility ETC Designation”).<sup>3</sup> The areas for the Highland ETC Designation and the AT&T Mobility ETC Designation do not overlap.

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<sup>1</sup> *Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket 96-45, Memorandum Opinion and Order, 19 FCC Rcd 6422 (2004).

<sup>2</sup> *Applications of AT&T Inc. and Dobson Communications Corporation for Consent to Transfer Control of Licenses and Authorization*, WT Docket No. 07-153, Memorandum Opinion and Order, 22 FCC Rcd 20295 (2007).

<sup>3</sup> *See High-Cost Universal Service Support, Federal-State Joint Board on Universal Service, Alltel Communications, Inc., et al, Petitions for Designation as Eligible Telecommunications Carriers, RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, WC Docket No. 05-337, CC Docket No. 96-45, Order, 23 FCC Rcd 9232 (2008) (“*CETC Cap Order*”).

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Due in large part to operational reasons, AT&T intends to consolidate various Dobson legal entities with current AT&T entities. When this occurs later this year or early next year Highland Cellular will cease to exist as a separate legal entity and instead its assets will be under AT&T Mobility. When this occurs, AT&T Mobility will work with the Universal Service Administrative Company to consolidate Highland Cellular's study area code ("SAC") with AT&T Mobility's SAC.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Cathy Carpino  
AT&T Services, Inc.

cc: Jennifer McKee, FCC  
Karen Majcher, USAC