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CC 99-200

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Federal Communications Commission
Washington, D.C. 20554

November 3, 2008

John A. Prendergast
D. Cary Mitchell
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street, N.W.
Washington, DC 20037

Re: Joint Opposition of Blooston Rural Carriers to Disclosure of Numbering Resource Utilization Data
Applications of AT&T Mobility Spectrum LLC, Union Telephone Company, and Cellco Partnership d/b/a Verizon Wireless for 700 MHz Band Licenses
FCC File Nos. 0003382436, 0003371176, 0003382435 and 0003382444
CC Docket No. 99-200

Dear Messrs. Prendergast and Mitchell:

On October 9, 2008, you filed an objection to the disclosure of any Numbering Utilization and Forecast ("NRUF") reports or any disaggregated, carrier-specific local number portability ("LNP") data in connection with the Commission's processing of the above-referenced Auction 73 700 MHz applications.¹ The objection was filed on behalf of 23 rural telephone carriers ("Blooston Rural Carriers") identified in the Objection. On October 31, 2008, you withdrew that objection on behalf of 15 of the Blooston Rural Carriers.² Eight of the Blooston Rural Carriers maintain their objection to the disclosure of their NRUF and LNP data in connection with the Commission's review of the above-referenced Auction 73 applications.³

The NRUF and LNP data to be placed in the record in connection with the above-referenced applications does not include any data provided by any of the eight Blooston Rural Carriers. Seven of those carriers have no spectrum holdings in the markets for which NRUF and LNP data supports the Commission's competitive analysis. The NRUF and the LNP data of these carriers thus is not pertinent to

¹ Letter from John A. Prendergast and D. Cary Mitchell, Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, Counsel to the Blooston Rural Carriers, to Marlene H. Dortch, Secretary, Federal Communications Commission (Oct. 9, 2008). See Applications of AT&T Mobility Spectrum LLC, FCC File No. 0003382436, Union Telephone Company, FCC File No. 0003371176, and Cellco Partnership d/b/a Verizon Wireless, FCC File Nos. 0003382435 and 0003382444, for 700 MHz Band Licenses, Auction No. 73; Numbering Resource and Forecast (NRUF) Reports and Local Number Portability Reports Placed Into the Record, Subject to Protective Order, CC Docket No. 99-200, *Public Notice*, DA 08-2226 (rel. Oct. 2, 2008); Applications of AT&T Mobility Spectrum LLC, Union Telephone Company, Cellco Partnership d/b/a Verizon Wireless For 700 MHz Band Licenses, Auction No. 73, FCC File No. 0003382436 *et al.*, CC Docket No. 99-200, *Protective Order*, DA 08-2225 (WTB rel. Oct. 2, 2008).

² Letter from John A. Prendergast and D. Cary Mitchell, Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, Counsel to the Blooston Rural Carriers, to Marlene H. Dortch, Secretary, Federal Communications Commission (Oct. 31, 2008).

³ These carriers are: Advanced Communications Technology, Inc.; Airwave Wireless, LLC; Butler-Bremer Communications, Inc.; Cedar-Wapsie Communications Inc.; Iowa Wireless Services, LLC d/b/a i wireless; Midstate Communications, Inc.; South Central Utah Telephone Association; and Uintah Basin Electronic Telecommunications.

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the competitive review. The data of the eighth company, which does hold spectrum that overlaps one market subject to detailed competitive review, does not have a material effect on the Commission's market-by-market analysis associated with the above-referenced applications. We are therefore not including the data of the eight objecting Blooston Rural Carriers in the record and, accordingly, it is unnecessary to rule on their objection.

Sincerely,

A handwritten signature in cursive script that reads "Katherine M. Harris". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Katherine M. Harris
Deputy Chief, Mobility Division
Wireless Telecommunications Bureau