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December 8, 2009

57739-000020

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

Re: Reexamination of Roaming Obligations of Commercial Mobile Radio Service
Providers (WT Docket No. 05-265)

Dear Ms. Dortch:

On December 7, 2009, Mark A. Stachiw of MetroPCS Communications, Inc. ("MetroPCS"), along with Carl W. Northrop and Michael Lazarus of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings"), participated in a meeting with Ruth Milkman, Nese Guendelsberger and Paul Murray regarding the above-referenced proceeding. The oral presentation in this meeting was consistent with the pleadings and *ex partes* filed on behalf of MetroPCS in the above-referenced proceeding, as further supplemented below.

MetroPCS stressed the critical importance of data roaming rights, and recommended that even if a further notice of proposed rulemaking pertaining to data roaming is issued, the Commission should immediately announce that Commission policy favors data roaming in all circumstances in which it is technically feasible and economically reasonable for carriers to provide such services.

MetroPCS also reiterated its view that causing a carrier to lose any in-market roaming rights after a set period of time, without any type of safe harbor to protect such in-market roaming rights, would be unfair to the wireless carrier, and would harm the consumers who will have come to rely on the roaming rights. MetroPCS advocated that if in-market roaming rights were not preserved indefinitely, the Commission should adopt a presumption that such rights survive absent an affirmative showing by the carrier seeking to deny roaming rights that the carrier seeking roaming rights has failed to make continued, meaningful progress in building out the licensed service area where in-market roaming is sought.

Kindly refer any questions in connection with this letter to the undersigned.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carl W. Northrop', written in a cursive style.

Carl W. Northrop
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Ruth Milkman
Nese Guendelsberger
Paul Murray

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