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April 6, 2010

VIA ELECTRONIC FILING

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

RE: Roaming Obligations of Commercial Mobile Radio Service Providers
WT Docket No. 05-265
Notice of Ex Parte Presentation

Dear Ms. Dortch:

On April 6, 2010, Joan Marsh, Jeanine Poltronieri and Terri Hoskins, representing AT&T, met with Charles Mathias, Legal Advisor to Commissioner Meredith Attwell Baker. The purpose of the meeting was to discuss the roaming obligations of CMRS providers. The AT&T representatives expressed AT&T's views, consistent with AT&T's comments filed in this proceeding, that changes to the existing roaming rules are not needed and that voluntary negotiated roaming agreements continue to flourish. Specifically, elimination of the "home market" roaming exception would frustrate facilities-based competition and dis-incent build-out.

AT&T's own roaming experiences illustrate the success of a market-based approach to roaming. Prior to the Commission's adoption of automatic roaming requirements in the 2007 roaming order, AT&T already had reciprocal roaming agreements with the vast majority of the GSM carriers in the United States. The same is true today. Indeed, AT&T has roaming agreements with every domestic GSM carrier (small or large) that has requested a roaming agreement with AT&T. Each agreement allows home market roaming and none discriminate through price or otherwise against roaming inside a carrier's licensed service area. In total, AT&T has entered into 42 domestic roaming agreements. There are only six domestic GSM carriers that do not have a roaming agreement with AT&T, and none of these carriers have requested a roaming agreement.

In accordance with the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

/s/ Jeanine Poltronieri

Copy:
Charles Mathias