

# McDermott Will & Emery

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April 14, 2010

VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*,  
WT Docket No. 05-265; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On April 13, 2010, Michael D. Rosenthal of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”), and David D. Rines of McDermott Will & Emery LLP met with James Schlichting, Nese Guendelsberger, Paul Murray, Peter Trachtenberg, and Ty Bream of the Wireless Telecommunications Bureau regarding the Commission’s proceeding on the roaming obligations of commercial mobile radio service (CMRS) providers.

In this meeting, we discussed the views expressed by numerous wireless carriers regarding the elimination of the in-market roaming exception.<sup>1</sup> In particular, SouthernLINC Wireless urged the Commission to adopt a strong presumption in favor of roaming and further urged the Commission to ensure that any statement regarding the types of factors that may be taken into account in roaming complaint proceedings does not inadvertently place any additional burdens on wireless service providers seeking roaming on just, reasonable, and nondiscriminatory terms and conditions.

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<sup>1</sup> / See, e.g., Notices of *Ex Parte* Presentations by Multiple Carriers (Cellular South, Leap Wireless and Cricket Communications, MetroPCS, National Telecommunications Cooperative Association, NTELOS, Rural Cellular Association, Rural Telecommunications Group, SouthernLINC Wireless, T-Mobile, and US Cellular), WT Docket No. 05-265, filed April 12, 2010, April 13, 2010, and April 14, 2010; See also Notice of *Ex Parte* Presentation by Sprint Nextel, WT Docket No. 05-265, filed April 13, 2010; Notice of *Ex Parte* Presentation by T-Mobile, WT Docket No. 05-265, filed April 13, 2010.

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SouthernLINC Wireless also discussed the status of the pending Petitions for Reconsideration in WT Docket No. 05-265 and urged the Commission to affirm its decision in its *2007 Roaming Order* to include push-to-talk (“PTT”) services within the scope of services covered by the Commission’s automatic roaming rule.

Finally, SouthernLINC Wireless reiterated its position that the Commission possesses ample legal authority to address data roaming and urged the Commission to move forward without delay on its planned *Further Notice of Proposed Rulemaking* on data roaming.

In accordance with the Commission’s rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of the above-referenced proceeding.

If you should have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

    /s/ David D. Rines    

David D. Rines

Counsel for SouthernLINC Wireless

cc: James Schlichting  
Nese Guendelsberger  
Paul Murray  
Peter Trachtenberg  
Ty Bream