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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

Applications of AT&T Inc.)

and)

Verizon Wireless,)

For Consent to Assign or Transfer Control)
of Licenses and Authorizations and)
Modify a Spectrum Leasing Arrangement)

WT Docket No. 09-104

**SUPPLEMENTAL RESPONSE OF AT&T INC. TO GENERAL INFORMATION
REQUEST DATED NOVEMBER 19, 2009**

May 5, 2010

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AT&T hereby supplements the answers provided on December 17, 2009 to Questions III.4-6 of the General Information Request dated November 19, 2009.

III. Sprint states that all CDMA coverage in approximately 32 percent of ALLTEL's original footprint within the Divestiture Markets will be eliminated. Sprint Comments at 10. On page 13 of their Joint Opposition, the Applicants assert that CDMA roaming opportunities will continue to be available post-transaction and state that "Verizon Wireless will continued to be a potential CDMA roaming partner in every CMA involved in this transaction and other carriers (at least 16 carriers across the 79 CMAs) have CDMA networks." Sprint further claims that AT&T's assertion that other CDMA roaming opportunities will continue to be available is not true and that 100 million CDMA roaming customers nationwide will lose service over an area three times larger than the Commonwealth of Virginia.

- 4. Does AT&T plan to renew or extend ALLTEL's CDMA roaming contracts when their terms expire?**
- 5. Post transaction, if AT&T plans to shut down the Divestiture CDMA Network, will AT&T continue to provide CDMA roaming on the same current terms until the network transition to GSM is completed?**
- 6. Will AT&T raise roaming price or change other terms and conditions for as long as it maintains the Divestiture CDMA Network? If yes, explain.**

RESPONSE:

There is no basis for imposing any CDMA roaming conditions on AT&T in this transaction. AT&T is a GSM carrier, not a CDMA carrier, *[Begin Highly Confidential]*

[REDACTED]

[End Highly Confidential] [Begin Confidential]

[REDACTED]

[End Confidential] CDMA carriers wanting CDMA roaming services in the Divestiture Markets should seek to partner with CDMA carriers in the Divestiture Markets, and not a GSM carrier.

[Begin Highly Confidential]

[REDACTED]

[End Highly Confidential]

Numerous CDMA roaming alternatives are available. In most Divestiture Markets, multiple CDMA carriers besides ALLTEL are already providing CDMA service, with additional

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CDMA carriers holding spectrum.¹ The locations where ALLTEL operates the only CDMA network are sparsely populated and extremely rural. For the ALLTEL Divestiture Markets included in this transaction, less than *[Begin Confidential] [End Confidential]* percent of ALLTEL's covered POPs were in areas where ALLTEL was the only CDMA roaming opportunity, and none of these areas included any interstate highways, which are the focus of roaming traffic.

In addition, substantial CDMA network buildout should occur in the Divestiture Markets in the next year, and there should be other CDMA carriers, including Verizon Wireless, in the Divestiture Markets that should be able to provide CDMA roaming services. *[Begin Highly Confidential]*

[REDACTED]

[End Highly Confidential]

¹ *In re Applications of AT&T Inc. and Verizon Wireless*, WT Docket 09-104, December 3, 2009, at 7-12.