

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of)	
)	
AT&T INC. and CELLCO PARTNERSHIP)	
D/B/A VERIZON WIRELESS)	DA 09-1978
)	WT Docket No. 09-121
For Consent to Assign or Transfer Control of)	
Licenses and Authorizations and Request a)	
Declaratory Ruling on Foreign Ownership)	
)	
File Nos. 0003888718 <i>et al.</i>)	

**SUPPLEMENT TO REPLY OF CELLULAR SOUTH TO JOINT OPPOSITION OF
VERIZON WIRELESS AND AT&T INC. TO PETITION TO DENY**

Cellular South, Inc. (“Cellular South”), by its attorney, hereby supplements its “Reply to Joint Opposition of Verizon Wireless and AT&T Inc. to Petition to Deny” (“Reply”) with regard to the above-captioned applications.¹ This supplement is provided at the request of the Commission’s staff to update the record as to the status of efforts to implement automatic data roaming between Cellular South and Cellco Partnership d/b/a Verizon Wireless (“VZW”) in markets acquired by VZW from ALLTEL.

In the Reply, Cellular South referred to its numerous communications with VZW in an attempt to implement EV-DO roaming with VZW in the former ALLTEL markets under the terms of Cellular South’s existing roaming agreement with VZW, and not Cellular South’s more limited roaming agreement with ALLTEL.² As explained in the Reply, Cellular South first requested VZW to add the former ALLTEL markets to the VZW-Cellular South roaming

¹ Cellular South’s Reply was filed October 20, 2009.

² See Reply at pp. 1-3.

agreement one week after the VZW-ALLTEL merger was completed, in a letter sent on January 16, 2009, and in numerous additional communications.

In February 2010, approximately 13 months after the initial request, Cellular South customers were able to have low-speed data roaming (CDMA 1X) in the former ALLTEL markets that VZW acquired. Higher speed EV-DO data roaming is now in a testing stage in the same markets and, if all goes well, that service could be available to customers within a few weeks. That means it will have taken approximately 19 months after Cellular South's election of which roaming agreement to rely upon for its customers to have EV-DO roaming, even in markets that are adjacent to Cellular South's service area such as Arkansas. Such delays have serious competitive implications for carriers such as Cellular South that do not have the national footprint of VZW.

Cellular South's Reply asked the Commission to delay action on the applications until VZW has taken all steps necessary to facilitate data roaming with Cellular South in the former ALLTEL markets. At a minimum, there should be a condition in any consent granted in this proceeding to require VZW to certify completion of all actions necessary on its part to facilitate data roaming with Cellular South in the former ALLTEL markets.

Respectfully submitted,



DAVID L. NACE
LUKAS, NACE, GUTIERREZ & SACHS LLP
8300 Greensboro Drive, Suite 1200
McLean, VA 22102
(703) 584- 8661

Attorney for Cellular South, Inc.

July 21, 2010

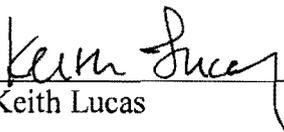
DECLARATION

I, Keith Lucas, declare and state the following:

1. I am the Manager of Carrier Relations for Cellular South, Inc. (“Cellular South”), a wireless telecommunications carrier that provides cellular and/or Personal Communications Service in portions of Mississippi, Alabama, Florida and Tennessee and holds authorizations to provide services in additional states. Cellular South’s address is 1018 Highland Colony Parkway, Suite 300, Ridgeland, MS 39157.

2. I am familiar with the facts stated in the foregoing “Supplement to Reply of Cellular South to Joint Opposition of Verizon Wireless and AT&T Inc. to Petition to Deny.” All such facts are true and correct of my own personal knowledge.

3. I certify under penalty of perjury that the foregoing is true and correct. Executed on July 21, 2010.



Keith Lucas

CERTIFICATE OF SERVICE

I, Linda J. Evans, hereby certify that on this 21st day of July, 2010, copies of the foregoing SUPPLEMENT TO REPLY OF CELLULAR SOUTH TO JOINT OPPOSITION OF VERIZON WIRELESS AND AT&T INC. TO PETITION TO DENY were sent by e-mail, in pdf format, to the following:

Best Copy and Printing, Inc.
FCC@BCPIWEB.COM

Michael P. Goggin, AT&T Mobility LLC
mg7268@att.com

Kathy Harris
Mobility Division
Wireless Telecommunications Bureau
kathy.harris@fcc.gov

Nancy J. Victory
Wiley Rein LLP
(Attorney for Cellco Partnership d/b/a
Verizon Wireless)
nvictory@wileyrein.com

Stacy Ferraro
Spectrum and Competition Policy Division
Wireless Telecommunications Bureau
stacy.ferraro@fcc.gov

Nese Guendelsberger
Wireless Telecommunications Bureau
nese.guendelsberger@fcc.gov

Linda Ray
Broadband Division
Wireless Telecommunications Bureau
linda.ray@fcc.gov

Susan Singer
Wireless Telecommunications Bureau
susan.singer@fcc.gov

Jim Bird
Office of General Counsel
jim.bird@fcc.gov

Monica DeLong
Wireless Telecommunications Bureau
monica.delong@fcc.gov

Neil Dellar
Office of General Counsel
neil.dellar@fcc.gov

[s] filed electronically

David Krech
Policy Division
International Bureau
david.krech@fcc.gov

Linda J. Evans

Catherine M. Hilke
Wiley Rein LLP
(Attorney for Verizon Wireless)
chilke@wileyrein.com