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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

November 18, 2010

Re: Notice of *Ex Parte* Presentation

RE: Docket No. 05-265

Dear Ms. Dortch,

This letter is to advise you, in accordance with Section 1.1206(b) of the Commission's rules, that on November 17, 2010, Chris Riley and Joel Kelsey of Free Press met with Ruth Milkman, Jim Schlichting, Nese Guendelsberger, Patrick DeGraba, and Paul Murray of the Wireless Telecommunications Bureau.

We reiterated our support for the Commission's proposal to extend automatic roaming obligations from voice services to data services. We discussed various potential theories of Commission authority to adopt data roaming obligations, as well as alternative frameworks for data roaming rules and how such frameworks interrelate with current law and regulation, consistent with the attached document. We further discussed the issues that arise from shared resources in mobile wireless data networks as a result of future roaming, and in particular we expressed strong opposition to activity that would discriminate between subscribers with potentially severe detrimental results for competition. We also noted that roaming agreements would result in substantial new revenue for network operators, and that such revenue should more than adequately offset any increased investments needed to manage the growth in demand.

Sincerely,

/s/ Chris Riley

Chris Riley, Policy Counsel
Free Press, Washington Office
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CC: Ruth Milkman, Jim Schlichting, Nese Guendelsberger, Patrick DeGraba, Paul Murray