



February 18, 2011

Marlene Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

e: *Ex Parte* Presentation
WT Docket No. 05-265

Dear Ms. Dortch:

On behalf of United States Cellular Corporation ("US Cellular"), this will respond to a series of questions from the Wireless Telecommunications Bureau ("WTB") staff pertaining to the above-referenced docket.

1. What standard/technology does your home network use? Do you currently offer 3G or 4G service on your home network? If not, what specifically are your plans for doing so? Do you sell devices that can operate on other carriers' networks (i.e. are banded to comparable spectrum?)

US Cellular's network uses CDMA 2000 - EVDO technology on its network, with the exception of portions of the St. Louis, Missouri MTA, on both its cellular/800 MHz and PCS/1900 MHz spectrum. US Cellular is currently considering its exact

4G deployment plans but has publicly announced that we have 4G LTE trials currently underway. US Cellular handsets are interoperable with other 800 MHz and 1900 MHz CDMA networks

2. What current data roaming agreements do you currently have? Nationwide 2G, 2.5G, 3G? Regional 3G? 4G?

US Cellular currently has data roaming agreements with a number of carriers operating in the United States including two with CDMA national carriers that include 3G technologies. We currently have no roaming arrangements for 4G.

3. In the past 36 months have you been unable to renegotiate and/or obtain a roaming agreement? If so, for what reasons?

Luckily, US Cellular has not been "unable" to negotiate roaming agreements. However, it is appropriate to note that the negotiations with one of the CDMA national carriers was unduly protracted and resulted in US Cellular customers being unnecessarily denied nationwide data roaming for a substantial period of time. US Cellular also believes that its ability to eventually enter into a data roaming agreement was reinforced by the strong likelihood that the FCC would act to require the negotiation of data roaming agreements on reasonable terms and conditions.

4. What assurances can roaming providers give the Commission that a data roaming obligation right now is essential to permit or accelerate network upgrades by the roaming provider?

US Cellular is currently evaluating the timing, scope and scale of its LTE deployments across its 26 state footprint. Providing regulatory certainty of a right to data roaming on reasonable terms and conditions will greatly enhance the Company's comfort level in making the significant capital investments necessary for an expeditious and widespread deployment of LTE in our licensed territories. If US Cellular customers do not have access to 4G roaming rights, they may find our 4G product offering less attractive and inferior to offerings of other carriers who are not so constrained, which would have to be taken into account in deciding how aggressively to deploy 4G within our footprint. Mandating data roaming will put all carriers on equal footing in their respective operating markets and provide the necessary incentive for making investments in such markets to their networks in order to compete in a 4G environment.

Sincerely,

/S/

Grant B Spellmeyer
Senior Director – Legislative & Regulatory Affairs

cc: All via e-mail
Ruth Milkman
James Schlichting