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March 7, 2011

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Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers and Other Providers of Mobile Data Services, WT Docket No. 05-265

Dear Ms. Dortch:

On March 4, 2011, Kathy Grillo of Verizon and Andy Lachance of Verizon Wireless met with Rick Kaplan, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, to discuss issues being considered in the Second Further Notice of Proposed Rulemaking in the above-captioned proceeding.

In the meeting, Verizon reiterated that parties advocating a data roaming requirement have failed to prove that market forces are not working to ensure that data roaming agreements are negotiated among carriers that desire such agreements. Verizon discussed factual information previously provided to the Commission showing that it continues to enter into data roaming agreements, including agreements for broadband 3G data roaming.

These facts demonstrate that market forces continue to work to ensure that carriers that want data roaming agreements, including data roaming agreements for broadband services, are able to enter into such agreements. For these reasons and those stated previously in Verizon Wireless' Comments and Reply Comments, we made clear that advocates of regulation have failed to demonstrate that a market failure exists that requires FCC data roaming regulation to remedy.

Verizon also discussed that data roaming regulation of nascent LTE services would be both premature and harmful to carrier implementation efforts. Finally, we discussed how any Commission data roaming requirement would necessarily lead to rate regulation.

Marlene H. Dortch
March 7, 2011
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This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan P. Klein". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

cc: Rick Kaplan