



The Voice of Rural & Regional Carriers

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March 24, 2011

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 05-265

Dear Ms. Dortch:

On March 23, 2011, Tim Donovan, Vice President, Legislative Affairs for Rural Cellular Association (RCA); In-Sung Yoo, Assistant Legislative & Regulatory Counsel for RCA; Alexander Maltas of Latham & Watkins LLP, counsel to RCA; and the undersigned met with Charles Mathias, Senior Legal Advisor to Commissioner Meredith Atwell Baker; and Rafi Martina, a Fellow in Commissioner Baker's office, to discuss the need for a data roaming requirement and the potential repercussions of failing to implement such measures.

In light of the FCC's inclusion of a data roaming order on its tentative April open meeting agenda, RCA and its counsel reiterated its view that a data roaming mandate is critical to promote a thriving, competitive wireless market. Recent market consolidation has reduced the number of potential roaming partners for rural and regional carriers. The proposed AT&T and T-Mobile merger will result in dramatic market consolidation, underscoring the immediate need for data roaming. The inability to negotiate commercially reasonable data roaming agreements has deterred small, rural and regional carriers from fully deploying advanced broadband networks. A data roaming mandate would facilitate an influx of capital, and spur carriers to ramp up investment and innovation, furthering the goals of the National Broadband Plan. RCA also provided Charles with a summary of RCA's economic study describing the impact of full wireless broadband deployment on rural America as a result of a data roaming mandate and an interoperability requirement. A copy of the summary is attached and the full report can be found [here](#). Accordingly, RCA strongly encouraged Commissioner Baker to support the proposed data roaming Order.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

- /s/ -

Rebecca Murphy Thompson
General Counsel

cc: Mr. Charles Mathias (via email)
Mr. Rafi Martina (via email)