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LATHAM & WATKINS LLP

March 28, 2011

Via ECFS

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

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Re: WT Docket No. 05-265
RM-11592

Dear Ms. Dortch:

On March 25, 2011, Steven K. Berry, President and CEO of the Rural Cellular Association (RCA); Tim Donovan, RCA's Vice President of Legislative Affairs; In-Sung Yoo, Assistant Legislative & Regulatory Counsel for RCA; and the undersigned met with Rick Kaplan, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski, to discuss the FCC's consideration of data roaming.

RCA continued to urge the Commission to adopt the data roaming order tentatively scheduled for the April 7, 2011 open meeting. In light of the recent announcement that AT&T plans to acquire T-Mobile USA, mandatory data roaming has become even more vital to competitive carriers. RCA reiterated that, in this increasingly concentrated industry, rural and regional carriers face significant difficulties in reaching data roaming agreements with the largest national carriers, yet such agreements are essential to their survival.

Rural and regional carriers provide mobile services across the nation, and are key to promoting a competitive wireless landscape. To facilitate cutting-edge mobile broadband network expansion, competitive carriers need the assurance that they will be able to reach data roaming deals. RCA agrees with the Chairman that automatic data roaming is a pro-business, pro-consumer, and pro-economy policy. An RCA-sponsored economic study – available [on its website](#) – found that incenting full broadband deployment as a result of automatic data roaming and mandatory interoperability will create or save 117,000 jobs in states with the lowest broadband availability and penetration.

RCA strongly urged the Commission to adopt an automatic data roaming rule at the April 7 open meeting and to continue to support consumer choice, business development, and economic and job growth by requiring interoperability throughout the 700 MHz band.

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

Sincerely,

/s/

Alexander Maltas
LATHAM & WATKINS LLP

Counsel for the Rural Cellular Association

cc: Rick Kaplan (via email)