



The Voice of Rural & Regional Carriers

805 15th Street NW, Suite 401
Washington, DC 20005
Office: (202) 449-9866 • Fax: (866) 436-1080

March 29, 2011

Via ECFS

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

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

Dear Ms. Dortch:

On March 28, 2011, Steven K. Berry, President and CEO of the Rural Cellular Association (RCA) spoke on the phone with Commissioner Robert M. McDowell and the Commissioner's Chief of Staff & Senior Legal Advisor, Angela E. Giancarlo, to discuss the Federal Communications Commission's (FCC or Commission) consideration of a data roaming mandate at its April 2011 open meeting.

RCA once again stressed the fundamental importance of an automatic data roaming rule to the rapid deployment of mobile broadband throughout the United States. Further industry consolidation threatens to subject competitive carriers to even greater difficulties in obtaining reasonable data roaming agreements. Meanwhile, wireless technology is transitioning to an all-IP framework. When voice and data are indistinguishable, a data roaming requirement is crucial to competitive carriers. A clear-cut data roaming rule helps provide smaller, competitive carriers the incentive needed to move forward and invest in mobile broadband services with next-generation technologies.

RCA also noted the significant economic benefits unleashed through automatic data roaming and interoperability throughout the 700 MHz band. Interoperability builds on a data roaming rule to provide the device flexibility needed to foster competitive connectivity. RCA sponsored a recent economic study that found full broadband deployment as a result of automatic data roaming and interoperability will create or save 117,000 jobs in 19 states with the lowest broadband availability and penetration—notably, most of those states are rural in nature. The Commission should immediately require automatic data roaming and 700 MHz interoperability to stimulate the creation of more jobs in Rural America.

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

Sincerely,

/s/

Steven K. Berry
President and CEO

cc: Commissioner Robert M. McDowell (via email)
Angela E. Giancarlo (via email)