



advocate for rural wireless telecommunications providers

Washington, DC

March 31, 2011

Via Electronic Delivery

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, D.C. 20554

**Re: Reexamination of Roaming Obligations of CMRS Providers
WT Docket No. 05-265**

Dear Ms. Dortch:

This letter is in response to AT&T's March 24, 2011 *ex parte* in the above-captioned proceeding acknowledging that it has entered into a 3G data roaming agreement with one of RTG's members, CTC Telcom dba Mosaic Telecom ("Mosaic").¹ RTG is thrilled that at least one of its members has been able to obtain an HSPA+ (3G) data roaming agreement with AT&T. To RTG's knowledge, this is the first domestic 3G data roaming agreement between AT&T and a rural mobile operator. RTG notes that this agreement was executed only after the FCC announced that it intended to adopt a data roaming mandate and right before AT&T announced its intention to acquire T-Mobile.

RTG is certain that the FCC's plan to mandate data roaming will be a giant step in assisting President Obama with his initiative to bring 4G mobile broadband to America, including those living, working and traveling in rural America. With the future data roaming mandate in place, rural wireless carriers can be assured that their investments in rural 3G and 4G networks will not be stranded because their subscribers will now have the ability to access the networks of the large carriers who hold the majority of spectrum below 1 GHz in urban and suburban areas across the nation. Likewise, urban consumers will be able to access rural networks when they travel through rural America provided that AT&T and Verizon do not block their respective customers' access to those networks.

RTG is anxious to review the soon to be adopted data roaming Report and Order and trusts that the FCC will take into account the impact of a potential AT&T/T-Mobile merger when putting the final touches on the Report and Order.

¹ See *Ex Parte* of AT&T Services, Inc. WT Docket No. 05-265 (filed March 24, 2011) and *Ex Parte* of Mosaic WT Docket No. 05-265 (filed March 30, 2011).

Should you have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

Rural Telecommunications Group, Inc.

By: /s/ Caressa D. Bennet
Caressa D. Bennet
General Counsel

cc (via email):

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Austin Schlick, General Counsel
Julie Veach, Deputy General Counsel
Edward Lazarus, Chief of Staff to Chairman Genachowski
Rick Kaplan, Chief Counsel and Senior Legal Advisor to Chairman Genachowski
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Louis Peraertz, Wireless Legal Advisor to Commissioner Clyburn
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Ruth Milkman, WTB Bureau Chief
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Patrick DeGraba, WTB Chief Economist
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Tom Peters, WTB Chief Engineer
Peter Trachtenberg, WTB Associate Chief, Competition Policy