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# LATHAM & WATKINS LLP

April 1, 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 31, 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 Commissioner Mignon Clyburn and Louis Peraertz, the Commissioner's Legal Advisor, to discuss the Commission's consideration of automatic data roaming.

RCA expressed strong support from its member carriers for the Commission's inclusion of the data roaming order for the April 7, 2011 open meeting. In light of the proposed AT&T/T-Mobile transaction, which will enable AT&T to add significantly to its already massive spectrum portfolio and will eliminate a major roaming partner, a strong data roaming requirement will be all the more crucial. In addition to automatic data roaming, RCA encouraged the Commission to act on interoperability for devices across the 700 MHz band. Data roaming and interoperability means jobs for America—an estimated 117,000 jobs in the 19 states with less than 90 percent broadband penetration will be created if data roaming and interoperability are required. Further, competitive connectivity will enable competitive carriers to offer their customers the services and devices that they expect and demand. For these reasons, RCA urged the Commission to adopt the data roaming measure at its coming meeting.

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

LATHAM & WATKINS<sup>LLP</sup>

Sincerely,

/s/

Alexander Maltas  
LATHAM & WATKINS LLP

*Counsel for the Rural Cellular Association*

cc: Commissioner Mignon Clyburn (via email)  
Louis Peraertz (via email)