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October 18, 2011

Via ECFS

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

Re: Notice of Ex Parte

**Reexamination of Roaming Obligations of Commercial Mobile Radio Service
Providers and Other Providers of Mobile Data Services
WT Docket No. 05-265**

Dear Ms. Dortch:

On Friday, October 14, 2011, the undersigned and Daryl Zakov representing the Rural Telecommunications Group, Inc. (“RTG”)¹ met with Mr. Mark Stone, Legal Advisor to FCC Commissioner Copps, to discuss voice roaming and data roaming concerns experienced by RTG members. This *ex parte* summarizes the matters discussed in the October 14 meeting.

RTG informed Mr. Stone that many of its members are reporting delays in moving forward on needed changes to existing roaming agreements with T-Mobile since April soon after the announcement of the proposed merger with AT&T, Inc. T-Mobile has been reluctant to make commercially reasonable changes to roaming agreements and has been using stalling tactics with RTG members. Many of RTG’s GSM members have reported a sense that T-Mobile has been “placed on ice” as a result of the proposed merger and is not moving forward with normal business-as-usual arrangements when it comes to domestic roaming agreements.

¹ RTG is a Section 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies through advocacy and education in a manner that best represents the interests of its membership. RTG’s members have joined together to speed delivery of new, efficient, and innovative telecommunications technologies to the populations of remote and underserved sections of the country. RTG’s members are small, rural businesses serving or seeking to serve secondary, tertiary, and rural markets. RTG’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies and each serves less than 100,000 subscribers.

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While questions concerning what actions are commercially reasonable have not been answered or are even before the Commission, RTG asserted that a carrier's refusal to negotiate roaming agreements because a merger has been proposed and the carrier is purportedly waiting for the outcome of the merger is not commercially reasonable. Both carriers attempting to enter into the merger—AT&T and T-Mobile—have a continuing duty to negotiate in good faith regardless of whether there is a merger pending.

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

Respectfully submitted,

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

cc: Mark Stone