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October 21, 2011

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VIA ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Written *Ex Parte* Presentation: *Applications of AT&T and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 11-65; *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:

T-Mobile USA, Inc. (“T-Mobile”) hereby responds to the unsubstantiated assertions regarding T-Mobile’s conduct in roaming negotiations made by the Rural Telecommunications Group, Inc. (“RTG”) in its October 11, 2011 *ex parte*.¹ RTG states that “many of its members” have experienced delay in negotiating changes to existing roaming since the above-captioned merger was announced, and that such negotiations have been “placed on ice” as a result of the merger.² RTG’s assertions lack substantiation. While its *ex parte* heavily relies on confidential factual information to support other assertions – two and a half pages of a five page *ex parte* are redacted – no factual information is provided in support of the roaming assertions regarding T-Mobile. RTG provides neither the identity of the complaining RTG members nor the specifics of their negotiations with T-Mobile. Given the absence of any substantiation, the Commission should afford the assertions no weight. The assertions about T-Mobile’s conduct in roaming negotiations also are untrue. T-Mobile has been an active supporter of the Commission’s efforts to expand access to roaming, including in the *Home Roaming*

¹ RTG *ex parte*, *Applications of AT&T and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 11-65 (October 11, 2011); see also RTG *ex parte*, *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers and Other Providers of Mobile Data Services*, WT Docket No. 05-265 (October 14, 2011).

² *Id.* at 5.



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and *Data Roaming* proceedings. T-Mobile has worked, and will continue to work, in good faith with any requesting carrier seeking voice or data roaming on T-Mobile's network. T-Mobile's conduct in this regard has not changed since announcement of the merger, and the door remains open for roaming negotiations today.

Sincerely,

/s/ Nancy J. Victory

Nancy J. Victory
Counsel for Deutsche Telekom AG
and T-Mobile USA, Inc.

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