



Telecommunications
Law Professionals PLLC

875 15th Street, NW, Suite 750
Washington, DC 20005
telephone 202.789.3120
facsimile 202.789.3112
www.telecomlawpros.com

cnorthrop@telecomlawpros.com
202.789.3113

January 27, 2012

BY ELECTRONIC COMMENT FILING SYSTEM

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

Re: Ex Parte Communication – 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 January 25, 2012, Mark A. Stachiw, Vice Chairman, Secretary & General Counsel of MetroPCS Communications, Inc. (“MetroPCS”), Peter Connolly, Counsel for United States Cellular Corporation, Rebecca Thompson, Counsel for Rural Cellular Association (“RCA”), Jill Canfield, Counsel for National Telecommunications Cooperative Association (“NTCA”), Brian O’Neil, Senior Vice President, General Counsel, Secretary for NTELOS Holdings Corp., (via teleconference), and Carl W. Northrop, Michael Lazarus and Jessica DeSimone of Telecommunications Law Professionals PLLC (“TLP”) (collectively, the “Joint Supporters”), met with Jim Schlichting, Nese Guendelsberger, Peter Trachtenberg, Brenda Boykin, and Paul Murray of the Federal Communications Commission (“FCC” or “Commission”) to discuss the above-referenced proceeding. Oral presentations made in this meeting were consistent with the pleadings and ex partes previously filed in this matter by the Joint Supporters.¹

The Joint Supporters reiterated that general stonewalling and delay issues are still prevalent in data roaming negotiations despite the Commission’s adoption of the data roaming Order.² The Joint

¹ See MetroPCS Communications, Inc., National Telecommunications Cooperative Association, NTELOS Holdings Corp., PRWireless, Inc., Revol Wireless, , Rural Cellular Association, Rural Telecommunications Group, United States Cellular Corporation, In the Matter of Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers and Other Providers of Mobile Data Services, Comments in Support of the Blanca Telephone Company Petition for Reconsideration, WT Docket No. 05-265 (filed Dec. 16, 2011).

² Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers and Other Providers of Mobile Data Services, WT Docket No. 05-265, Report and Order, FCC 11-52 (rel. Apr. 7, 2011), 76 Fed. Reg. 26199 (May 6, 2011) (“Order”).

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Supporters stressed that imposing a shot clock on such negotiations is necessary to provide the proper incentive for potential roaming partners to timely respond to inquiries. Although data roaming negotiations may involve complex issues, the Joint Supporters emphasized that other situations that incorporate shot clocks, such as interconnection and siting negotiations, also have the potential to involve complex issues, and yet, a shot clock still has been successfully implemented in those negotiations.

Finally, the Joint Supporters discussed the benefits of having a shot clock implemented, rather than solely relying on the current complaint process. Specifically, the Joint Supporters emphasized that a shot clock would bring potential roaming partners to a point of offer, thereby essentially acting as a Commission rule to incent the larger carriers to engage in good faith negotiations in a reasonable time frame.

Any questions regarding this notice should be directed to the undersigned.

Sincerely,

/s/ Carl W. Northrop

Carl W. Northrop
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Nese Guendelsberger
Peter Trachtenberg
Brenda Boykin
Paul Murray
Jim Schlichting