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January 30, 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 – In the Matter of Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC For Consent To Assign Licenses; Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC For Consent To Assign Licenses, WT Docket No. 12-4

Dear Ms. Dortch:

On January 26, 2012, William Kreisher, Senior Vice President of Corporate Development of Atlantic Tele-Network, Inc. ("ATN"), along with Michael Lazarus of Telecommunications Law Professionals PLLC ("TLP"), met with Renata Hesse, Virginia Metallo, Sandra Danner, Paul Murray, Aleks Yankelevich, Joel Rabinovitz, Susan Singer, Tim Stelzig, Christopher Sova, Eric Ralph, Paul LaFontaine, Jennifer Salhus, Bill Dever, and Lisa Gelb of the Federal Communications Commission ("FCC" or "Commission") to discuss the above-referenced transactions.

During the meeting, ATN discussed the attached written presentation. In addition, ATN noted that it has not taken a position on the merits of the transaction at this preliminary stage. However, ATN stressed the immediate need for additional spectrum for rural carriers in order for them to continue to provide robust competition against the larger carriers. Without such spectrum, the ability of smaller carriers to provide competitive services would drastically decrease. ATN also expressed its concern about current and future spectrum speculation, and asked that the Commission inquire about the role of spectrum speculation in both of the above-referenced transactions, as well as other situations in which entities with no clear intent to build out wireless networks are only holding on to spectrum in the hopes of seeking favorable valuation arbitrage. Such speculation would not be in the public interest. Finally, ATN urged the Commission to examine the above-referenced transactions to ensure that spectrum needed by smaller rural carriers in the immediate term is not left unused through the practice of spectrum warehousing by known operators who may be focused on deployment in larger markets. ATN expressed the view that it would be in the public interest to allow spectrum to be put to use by those that have an immediate need as soon as possible.

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

Sincerely,

/s/ Michael Lazarus

Michael Lazarus
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

Attachment

cc (via email): Renata Hesse
Virginia Metallo
Sandra Danner
Paul Murray
Aleks Yankelevich
Joel Rabinovitz
Susan Singer
Tim Stelzig
Christopher Sova
Eric Ralph
Paul LaFontaine
Jennifer Salhus
Bill Dever
Lisa Gelb