

April 24, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: Applications of Cellco Partnership d/b/a Verizon  
Wireless, SpectrumCo LLC, and Cox TMI Wireless,  
LLC For Consent To Assign Licenses;  
WT Docket No. 12-4

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Dear Ms. Dortch:

On April 20, 2012, Outside Counsel of Record for Communications Workers of America (“CWA”) filed a letter in this docket describing in careful detail the problems that they had experienced with review of the information and documents filed by the Applicants in this proceeding at the direction of the Commission.<sup>1</sup> CWA is not alone in experiencing these problems. Other Outside Counsel of Record, Outside Consultants, and experts for interested parties, who have filed Acknowledgments of Confidentiality pursuant to the Protective Orders in this proceeding,<sup>2</sup> have encountered the same or similar delays and technical difficulties, including files that cannot be opened with software commonly used by law firms.

Additionally, some organizations representing the public interest and some of the smaller companies participating in this proceeding have run into difficulties related to the Summation Enterprise software formats specified by the Commission for responses to document requests. Organizations and firms that do not have this expensive software (or other software capable of working with Summation Enterprise load files) have been seriously challenged in their attempts to search through the daunting volumes of files and review relevant documents. Some parties who have filed Acknowledgments have been deterred from reviewing the

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<sup>1</sup> Letter from Monica S. Desai of Patton Boggs LLP to Commission Secretary, April 20, 2012 (the “CWA Letter”).

<sup>2</sup> *Applications of Cellco Partnership d/b/a Verizon Wireless, Cox TMI Wireless LLC and SpectrumCo LLC for Consent to Assign Licenses*, WT Docket No. 12-4, Protective Order, DA 12-50; Second Protective Order, DA 12-51 (rel. Jan. 17, 2012) (“Protective Orders”).

documents by the charges that the Applicants are imposing for paper copies and electronic media (\$2,124.39 to date) and the cost of conducting a meaningful review. They must initially rely on discussions with others who have been able to study the documents, which adds additional time to the process. These smaller companies and organizations may be seriously affected by the arrangements among Verizon Wireless, the members of SpectrumCo LLC, and Cox TMI Wireless. The public interest organizations speak for consumers who would never be able to research the facts and issues arising from complex agreements that will directly affect their communications choices in the future.

As parties have argued in Petitions, Comments, and Reply Comments filed in this proceeding, the transactions under review have the potential to forever change the competitive landscape in the wireless, broadband, and video markets. The Commission has taken significant steps toward making its process transparent by allowing authorized personnel to review and analyze the documentation that it has required from the Applicants. Now, considering the delays in receiving data and the technical challenges involved, the Commission should take the further step of giving reviewers the additional time that is necessary to study the documents and data and respond to the Commission with cogent analysis.

CWA has demonstrated that there is significant precedent for allowing such additional time.<sup>3</sup> Accordingly, the undersigned parties support CWA's request that the Commission suspend its 180-day transaction timeclock to ensure a meaningful opportunity for review of the relevant materials and the preparation of insightful comment on these transformative arrangements.

Sincerely,

/s/

/s/

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<sup>3</sup> CWA Letter at 2-3.

/s/

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