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Vice President
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August 3, 2012

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Ex Parte

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

Re: *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; Application of Cellco Partnership d/b/a Verizon Wireless and T-Mobile License LLC for Consent to Assign Licenses, WT Docket No. 12-175*

Dear Ms. Dortch:

As explained in the above-referenced applications, the Commission has on numerous previous occasions approved the ownership structure of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), including specific authority to hold AWS licenses.¹ Cellco is ultimately owned by Verizon Communications Inc. (“Verizon”), a publicly traded U.S. corporation, and Vodafone Plc (“Vodafone”), a publicly traded U.K. corporation. This will confirm that Cellco is not aware of any changes to the aggregate foreign ownership of Verizon and Vodafone that are inconsistent with the requirements set forth in *Applications of Vodafone AirTouch, Plc and Bell Atlantic Corporation for Consent to Transfer of Control or Assignment of Licenses and Authorizations*, Memorandum Opinion and Order, 15 FCC Rcd 16507, ¶ 19 (IB and WTB, 2000). In addition, no more than 25 percent of Verizon’s outstanding stock is owned by shareholders that the company’s records identify as non-U.S. citizens. Attached hereto is a chart depicting the entities through which Vodafone holds its indirect ownership interest in Cellco.

¹ See, e.g., *International Authorizations Granted*, Report No. TEL-01090, Public Notice, 21 FCC Rcd 13575 (IB 2006)(extending existing foreign ownership ruling for Cellco Partnership to cover AWS licenses).

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This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

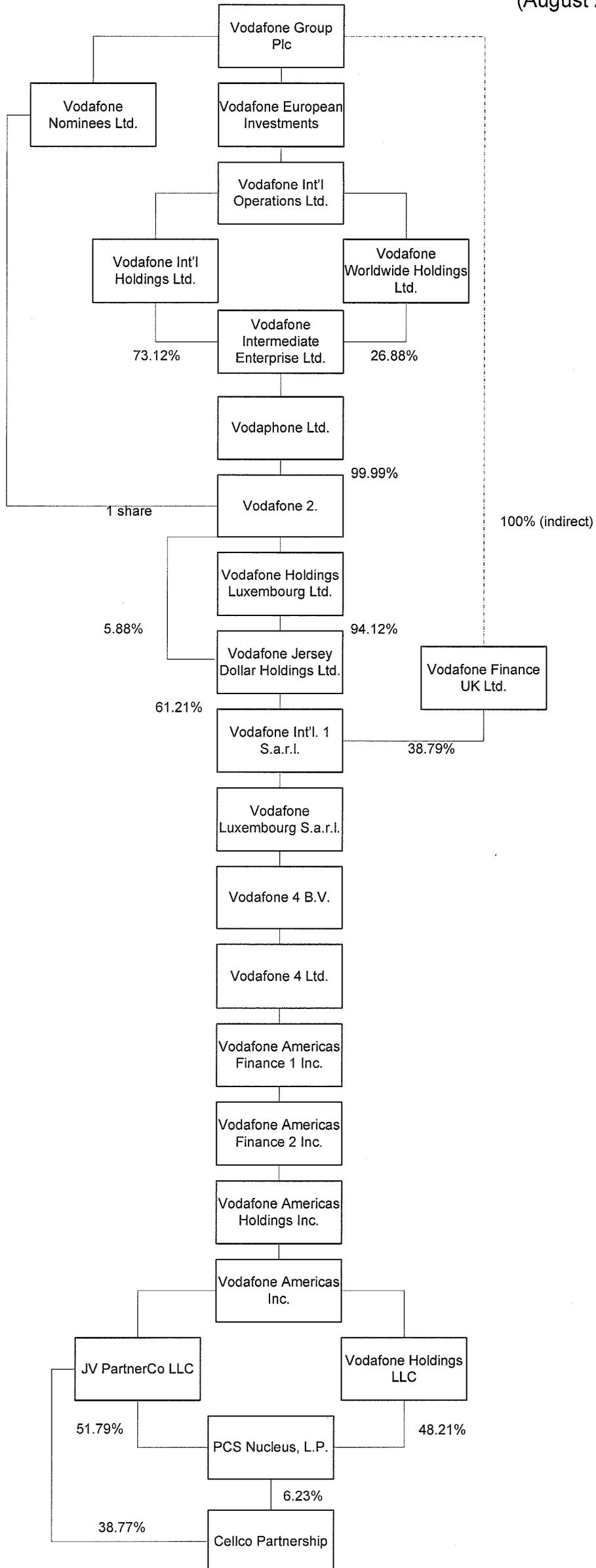
Sincerely,

A handwritten signature in black ink, appearing to read "James L. Green". The signature is written in a cursive style with a large initial "J" and a distinct "L" and "G".

Attachment

cc: David Krech

Vodafone Cellco Partnership Ownership
(August 2012)*



*Unless otherwise indicated, all ownership percentages are 100%

The following entities are organized in the UK: Vodafone Group Plc, Vodafone European Investments, Vodafone Nominees Ltd., Vodafone International Operations Ltd., Vodafone International Holdings Ltd., Vodafone Worldwide Holdings Ltd., Vodafone Intermediate Enterprises Ltd., Vodafone Ltd., Vodafone 2., Vodafone Holdings Luxembourg Ltd., Vodafone Jersey Dollar Holdings Ltd. (Jersey), Vodafone Finance UK Ltd., and Vodafone 4 Ltd. (Jersey).

The following entities are organized in Luxembourg: Vodafone International 1 S.a.r.l. and Vodafone Luxembourg S.a.r.l.

The following entity is organized in the Netherlands: Vodafone 4 B.V.

The following entities are organized in the US: Vodafone Americas Finance 1 Inc., Vodafone Americas Finance 2 Inc., Vodafone Americas Holdings Inc., Vodafone Americas Inc., JV PartnerCo LLC, Vodafone Holdings LLC, and PCS Nucleus, L.P.