



Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004
T +1 202 637 5600
F +1 202 637 5910
www.hoganlovells.com

Trey Hanbury
Partner
T: 202.637.8312
trey.hanbury@hoganlovells.com

February 27, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte Notice*

Review of Foreign Ownership Policies for Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended, IB Docket No. 11-133

Dear Ms. Dortch:

On February 25, 2013, Michele Farquhar, Ari Fitzgerald, and the undersigned of Hogan Lovells US LLP, participated in a conference call with Troy Tanner, Jim Ball, Kathleen Collins, Susan O'Connell, David Krech, and Howard Griboff of the International Bureau, and Kate Dumouchel of the Office of General Counsel, who is on detail to the Office of Chairman Julius Genachowski. The purpose of the call was to discuss issues raised by Vodafone Group in the above-referenced proceeding.

We reiterated Vodafone's support for time limits on agency review, notice procedures, and other measures that would streamline the processing of petitions for declaratory ruling involving indirect foreign investment in common carrier wireless licensees. Vodafone also joined Verizon in observing that requiring foreign entities whose qualifications the Commission has already passed upon repeatedly to re-apply for an additional foreign-ownership review would represent an inefficient procedure contrary to the streamlining goals of this proceeding.¹ The parties then discussed several potential changes to the regulation of indirect foreign investment in Commission common carrier wireless licensees that might accelerate the regulatory review process, including: (i) creating allowances in the new FCC foreign ownership guidelines for small amounts of foreign investment; (ii) providing flexibility to alter the composition of indirect non-controlling and controlling foreign interests; and (iii) establishing similar procedures for Section 310(b)(4) and Section 310(b)(3)

¹ See Letter of Ian Dillner, Vice President, Federal Regulatory Affairs, Verizon, to Marlene Dortch, Secretary, Federal Communications Commission, IB Docket IB Docket No. 11-133 (Feb. 19, 2013).

Ms. Marlene Dortch
Secretary

- 2 -

February 27, 2013

forbearance investments. Vodafone supports any measures that encourage foreign investment by minimizing regulatory burdens on Commission licensees.

Consistent with Section 1.1206 of the Commission's rules, please associate this letter with the above-referenced docket.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to Vodafone Group