



Information Age Economics
4530 Dexter Street, N.W.
Washington, D.C. 20007

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
44512th. Street, S.W.
Washington, DC 20554

February 20, 2014

Re: Notice of Ex Parte Presentation: WT Docket No. 05-265: Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers; WT Docket 13-193: Applications of Cricket License Company, LLC, et al., Leap Wireless International, Inc., and AT&T Inc. for Consent To Transfer Control of Authorizations; WT Docket 12-69: In the Matter of Promoting Interoperability in the 700 MHz Commercial Spectrum

Dear Ms. Dortch,

Canada's largest wireless operator, Rogers Communications, has acquired the 700 MHz Lower Band A and B Blocks in Canada's auction of licenses in this band. These licenses in Southern Ontario, Eastern Ontario, Southern Quebec, Eastern Quebec, British Columbia, Alberta, Newfoundland, Nova Scotia and New Brunswick cover most of our northern neighbor's population.

This outcome is a consequence of Industry Canada's decision to limit the acquisition of 700 MHz licenses by the largest Canadian operators in this auction to only one of the most highly valued Lower Band Blocks B and C and Upper Band Blocks C1 and C2. Rogers, AT&T's #1 roaming partner in Canada, will now deploy LTE in Band Class 12.

This development in Canada will confirm the Federal Communications Commission's recognition that AT&T must introduce interoperability promptly across all paired frequencies in the Lower 700 MHz band, to the benefit of Lower Block A licensees in the U.S. and competition in the U.S. mobile market. We also propose that as one condition for approval of any of its applications to acquire more spectrum, AT&T should be obliged to offer LTE roaming to other U.S. operators on its 700 MHz deployments, with terms and conditions that are at least as favorable as those that Rogers presumably enjoys.

Yours sincerely,

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