

August 19, 2011

Via Electronic Filing

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

Re: *Application of AT&T Mobility Spectrum LLC and BTA Ventures II, Inc.* – ULS File No. 0004777216; *Applications of AT&T Inc. and Deutsche Telekom AG* – WT Docket No. 11-65; *Application of AT&T Mobility Spectrum LLC and Qualcomm Incorporated* – WT Docket No. 11-18

Dear Ms. Dortch:

On April 27, 2011, the undersigned parties (“Joint Parties”) filed a motion asking the Commission to consolidate its review of two closely related applications: the application of AT&T, Inc. (“AT&T”) to acquire 700 MHz licenses from Qualcomm, Inc. (“Qualcomm”), and AT&T’s separate application to acquire T-Mobile USA, Inc. (“T-Mobile”).¹ Subsequently, on June 9, the Joint Parties asked the Commission to expand the requested consolidation to encompass a series of 44 other proposed license assignments and transfers under which AT&T would acquire even more 700 MHz spectrum.² As the Joint Parties explained, reviewing these “Serial 700 MHz Applications” in an uncoordinated manner could mask their collective impact on the public interest as well as their close relationship to the Qualcomm and T-Mobile applications.

On August 5, 2011, the Commission released a public notice regarding yet another application by AT&T to amass 700 MHz spectrum – this time in the New Jersey 2-Ocean Cellular Market Area (“CMA”).³ For the reasons given in the Joint Parties’ June 9 motion, this new Serial 700 MHz Application also should be consolidated with the Commission’s review of the AT&T/T-Mobile and AT&T/Qualcomm applications.

In a recent letter, the Commission recognized that AT&T’s proposed Qualcomm and T-Mobile “transactions raise a number of related issues, including, but not limited to, questions regarding AT&T’s aggregation of spectrum throughout the nation, particularly

¹ Joint Motion to Consolidate, WT Docket Nos. 11-65 & 11-18 (Apr. 27, 2011).

² Joint Motion to Consolidate, WT Docket No. 11-65 *et al.* (June 9, 2011).

³ *AT&T Mobility Spectrum LLC and BTA Ventures II, Inc. Seek FCC Consent to the Assignment of Lower 700 MHz Band B Block License*, ULS File No. 0004777216, Public Notice, DA 11-1358 (rel. Aug. 5, 2011).

in overlapping areas.”⁴ The Commission consequently concluded that it should consider both applications in a coordinated manner and stopped the Commission’s “180-day clock” in the Qualcomm proceeding.

AT&T’s Serial 700 MHz Applications, including its most recent application for a 700 MHz license in the New Jersey 2-Ocean CMA, also raise a number of the same issues, such as AT&T’s aggregation of spectrum in overlapping areas, as the issues raised by the T-Mobile and Qualcomm applications. The Joint Parties accordingly request that the Commission coordinate and consolidate its review of all of these applications.

Sincerely,

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⁴ Letter from Rick Kaplan, Chief, Wireless Telecommunications Bureau, to Michael P. Goggin, AT&T Mobility Spectrum, and Dean Brenner, Qualcomm, WT Docket No. 11-18 (rel. Aug. 8, 2011).

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Certificate of Service

I, Colleen von Hollen, of Bennet & Bennet, PLLC, 4350 East West Highway, Suite 201, Bethesda, MD 20814, hereby certify that on this 19th day of August, 2011, I caused a true and correct copy of the foregoing letter to be served on those listed below as follows:

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