

January 19, 2012

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Re: WT Docket No. 12-4, Proposed Assignment of Licenses to Verizon Wireless from SpectrumCo and Cox TMI Wireless

Dear Ms. Dortch:

NATOA submits this letter in response to the applications filed by Cox and SpectrumCo seeking approval to transfer Advanced Wireless Spectrum licenses to Verizon Wireless. These transfers represent but one part of a larger transaction involving these companies that has the potential to affect competition in broadband, video, and wireless services. At this time, we do not address the merits of the transactions. However, we do believe it is important that the Commission and interested parties have the opportunity to fully review and comment on the transfers to ensure they are in the public interest.

Therefore, we write to support the position asserted by Public Knowledge that the Commission establish procedures that would permit parties to challenge the designation of confidential data submitted in this proceeding and to clarify the legal standard for the designation of such materials.

We agree with Public Knowledge that data for which confidential treatment is sought must be commercially sensitive. In addition, we agree that the Commission should establish a reasonable timeframe within which parties may challenge and obtain a decision on the confidentiality designation of particular documents. Clarifying the legal standard and instituting such a process would continue to protect truly confidential documents and ensure that designation challenges are handled in a timely manner by the Commission.

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Pursuant to Commission rules, please include a copy of this notice in the record for the proceeding noted above.

Sincerely,

Stephen Traylor Executive Director

NATOA