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February 9, 2012

BY ELECTRONIC COMMENT FILING SYSTEM

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

Re: Ex Parte Communication – In the Matter of 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

Dear Ms. Dortch:

This letter is filed on behalf of MetroPCS Communications, Inc. (“MetroPCS”) with reference to the above applications. MetroPCS notes that several written ex parte letters recently have been filed in the docket¹ asking the Commission to require the above-referenced applicants (the “Applicants”) to file in the record, on a confidential basis, complete and unredacted copies of certain commercial agreements (the “Commercial Agreements”) that they have entered into.² These ex parte letters also ask the Commission to suspend the pleading cycle in the proceeding pending the submission of the unredacted agreements.

Prior to the submission of the recent requests pertaining to the Commercial Agreements, MetroPCS had outlined to the Commission certain other pertinent information that it should consider requesting from the Applicants before a proper public interest determination can be made with respect to the pending applications.³ Specifically, the Commission should gather and analyze a variety of data from

¹ See Letter from Media Access Project, Free Press, Public Knowledge and The Greenlining Institute to Marlene H. Dortch, WT Docket No. 12-4 (filed Feb. 7, 2012); see also Letter from DIRECTV, Rural Telecommunications Group, Inc., Sprint Nextel Corporation, T-Mobile USA, Inc., and Rural Cellular Association to Marlene H. Dortch, WT Docket No. 12-4 (filed Feb. 8, 2012).

² The Applicants in this proceeding have entered into several agreements which provide such parties “the ability to act as agents selling on another’s services, and provide the members of SpectrumCo the option of acting as resellers in the future. They also establish a joint venture to develop innovative technology and intellectual property that will integrate wired video, voice, and high-speed Internet with wireless technologies.” See Letter from Michael H. Hammer to Marlene H. Dortch, WT Docket No. 12-4 at 2 (filed Jan. 18, 2012).

³ See Letter from Carl W. Northrop to Marlene H. Dortch, WT Docket No. 12-4 (filed Jan. 25, 2012).

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both the Buyer (Verizon Wireless) and the Sellers in these transactions (Comcast, Cox, Time Warner and Bright House Networks) pertaining to spectrum utilization, the circumstances surrounding the acquisition of the licenses by SpectrumCo and the intentions of the parties, and the competitive impact of the transaction on the roaming and backhaul markets.

In view of the growing list of information that interested parties have asked be filed by the applicants in order for the pending transactions to be properly assessed, MetroPCS strongly supports the requests that the Commission suspend the pleading cycle in this proceeding until the requests for additional information have been acted upon by the Commission and any additional information requested by the Commission is submitted. Resetting the pleading cycle will accord interested parties an opportunity to make informed comments with a fuller understanding of the potential competitive public interest impacts of the transactions. Allowing parties to file comments based upon a complete record also will avoid the need for supplemental filings that could actually result in greater delay in the processing of the applications.

As previously indicated by MetroPCS, since the Buyer, Verizon Wireless, has indicated that the transaction is being pursued to meet its medium- to long-term spectrum needs, not immediate needs, the Sellers have not indicated a particular need for expedited processing, and because no existing customer services, employees, or operations are being placed in play as a result of the proposed transactions, resetting the pleading cycle will not have any adverse public interest consequences.

Any questions regarding this notice should be directed to the undersigned.

Sincerely,

/s/ Carl W. Northrop

Carl W. Northrop
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Renata Hesse
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