



July 10, 2012

Marlene H. Dortch Secretary Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

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:

As the largest mid-size carriers focused on serving the broadband needs of rural America, Frontier Communications ("Frontier") and Windstream Communications ("Windstream") write to extend our full support for the letter that ITTA, the Independent Telephone & Telecommunications Alliance, filed in this docket today. Frontier and Windstream concur with ITTA that "the pending spectrum transactions are integrally bound up with the expansive business arrangements embodied in the agency, resale and joint operating agreements filed in this proceeding by the Applicants." Accordingly, Frontier and Windstream strongly support ITTA's recommendation that "open review of the Commercial Agreements by the Commission is required before ruling on the pending license assignment applications, and appropriate conditions should be imposed on the Applicants to protect competition and the public interest."³ We urge the Commission to consider fully the positions expressed in ITTA's letter and take the necessary steps necessary to prevent the competitive and public interest harms identified therein.

Please feel free to contact us with any further questions.

Sincerely,	
/s/	/s/
Kathleen Q. Abernathy	Eric N. Einhorn
Executive Vice President, External Affairs	Senior Vice President of Government Affairs
Frontier Communications	Windstream Communications

¹ Letter from Genny Morelli, President, ITTA, to Marlene H. Dortch, Secretary, Fed. Commc'ns Comm'n, WT Dkt. No. 12-4 (filed Jul. 9, 2012).

 $[\]frac{1}{2}$ *Id.* at 1. $\frac{1}{3}$ *Id.*

cc: Sandra K. Danner, Broadband Division Wireless Telecommunications Bureau