



Federal Communications Commission  
Washington, D.C. 20554

July 20, 2011

*Via U.S. Mail and Electronic Mail*

Richard L. Rosen, Esquire  
Arnold & Porter, LLP  
555 12<sup>th</sup> Street, NW  
Washington, DC 20004

**Re: Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of License and Authorizations, WTB Docket No. 11-65**

Dear Mr. Rosen:

Within the past week, AT&T has indicated that, since filing its public interest statement supporting its proposed acquisition of T-Mobile and its opposition comments to various petitions to deny the merger, it has developed new models upon which it now relies. Indeed, AT&T is now expressly relying on these models to bolster its arguments concerning the size of the efficiencies made possible by the merger as weighed against the potential anti-competitive effects. We first learned of the scope of these models on July 13, 2011, during an *ex parte* meeting on economic issues held at the Commission, and now understand that our first opportunity to access the finalized versions of the new models will be on July 25, 2011.

We appreciate your willingness to work with us to help us understand and evaluate your forthcoming submission. At the same time, however, given your express reliance on these new models, we have stopped the Commission's informal 180-day clock until we have the information required to evaluate these models. We believe this is necessary to allow sufficient time not only for the Commission to evaluate and test this new evidence, but also for third parties to have an opportunity to provide feedback to the Commission on the contents and construction of the yet-unseen models.

As such, the clock has stopped effective today, July 20, 2011. The Commission will restart the clock once the new evidence has been provided to us in a format and with sufficient explanation and back-up information to enable us, and third parties entitled to have access to the information, to adequately evaluate it. We will also allow time before restarting the clock for those third parties to have a meaningful opportunity to comment on the submission.

We look forward to receiving the promised materials on July 25, 2011, and to your cooperation in providing us with access to the information and personnel needed to understand and evaluate this new evidence and the other materials you have submitted in support of your underlying application.

Please do not hesitate to contact me or Renata Hesse, our Senior Counsel to the Chairman for Transactions, should you have any questions concerning the foregoing.

Sincerely,

A handwritten signature in blue ink that reads "Rick Kaplan". The signature is stylized, with the first letters of the first and last names being large and prominent. A long horizontal line extends from the end of the signature to the right.

Rick Kaplan  
Chief, Wireless Telecommunications Bureau