

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Application of AT&T Inc. and)	WT Docket No. 11-65
Deutsche Telekom AG)	
)	
For Consent to Assign or Transfer)	
Control of Licenses and Authorizations)	

**PETITION TO DENY
OF
IOWA WIRELESS SERVICES, LLC**

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SUMMARY

Iowa Wireless Services, LLC (“Iowa Wireless”) submits this Petition to Deny the Application filed by AT&T Inc. (“AT&T”), Deutsche Telekom AG (“DT”), and T-Mobile USA, Inc. (“T-Mobile”) for consent to assign or transfer control licenses and authorizations held by certain DT/T-Mobile subsidiaries and affiliates, including those held by Iowa Wireless Services Holding Corporation. Iowa Wireless does not ask the Commission to deny AT&T’s Application on an absolute basis. Rather, Iowa Wireless requests that the FCC also require AT&T to agree to certain commitments to foster the continued provision and expansion of wireless services in rural areas, should the FCC determine that the transaction is in the public interest.

Through a series of intermediate subsidiaries, DT holds a 100 percent ownership interest in T-Mobile, which in turn indirectly holds a 100 percent ownership interest in VoiceStream PCS. VoiceStream PCS holds a 54 percent interest in Iowa Wireless, and DT is authorized by the Commission to hold up to a 60 percent indirect interest in Iowa Wireless.

Iowa Wireless has close contractual relationships with 76 small independent telephone companies (“ITCs”) to extend the reach of its network to include remote rural areas. Iowa Wireless partitioned and disaggregated spectrum and market areas to the ITCs, and they invested considerable capital and other resources to construct wireless networks to serve their local communities. Iowa Wireless also partnered with T-Mobile so that its customers would have nationwide access to a ubiquitous GSM/UMTS network with voice and high speed data communications capabilities. Iowa Wireless and the ITCs have invested heavily in PCS and AWS spectrum, and GSM and 3G UMTS/HSPA infrastructure, equipment, and handsets to ensure that their rural constituents have the same ability to roam and have access to wireless services to the same extent as their urban and suburban counterparts.

Iowa Wireless has not been able to obtain any information regarding how – if at all – AT&T will incorporate Iowa Wireless into its long-term plans, nor has Iowa Wireless been able to determine what impact, if any, the transaction will have on Iowa Wireless’s rural customers with respect to continued network access at reasonable rates. Accordingly, in order to ensure that rural subscribers are not adversely impacted by the proposed transaction, Iowa Wireless requests that the Commission condition its consent on AT&T’s agreement to meet the following commitments: (1) that AT&T maintain the legacy T-Mobile GSM and UMTS/HSPA networks until such time as Iowa Wireless and the ITCs can transition to the technology path chosen by AT&T for LTE deployment; (2) that AT&T provide roaming services that is compatible with Iowa Wireless’s voice and data technologies as Iowa Wireless transitions to more advanced 3G services, be required to roam bilaterally with Iowa Wireless as Iowa Wireless currently does with T-Mobile, and that Iowa Wireless be given the option to continue to operate with AT&T under the existing T-Mobile roaming agreement if the parties cannot agree on terms of a new roaming arrangement to avoid loss of roaming capabilities by rural customers; (3) that AT&T work with manufacturers to make handsets compatible with both Iowa Wireless and AT&T’s networks available on a timely basis, and in sufficient quantities to meet the handset demands of Iowa Wireless’s subscribers; (4) that AT&T will not seek to repurpose Iowa Wireless’s spectrum for LTE or other purposes until such time as Iowa Wireless, the ITCs, and their customers are ready and able to transition to such services; and (5) that AT&T will adhere to existing agreements

between Iowa Wireless and T-Mobile, and not negate the enormous investment that Iowa Wireless and the ITCs have made in Iowa's rural communities by undermining the technology currently deployed.

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PETITION TO DENY

Iowa Wireless Services, LLC d/b/a i wireless, parent company of Iowa Wireless Services Holding Corporation (together, “Iowa Wireless”), by its undersigned attorneys, submits this Petition to Deny the Application filed by AT&T Inc. (“AT&T”), Deutsche Telekom AG (“DT”), and T-Mobile USA, Inc. (“T-Mobile”) for consent to assign or transfer control licenses and authorizations held by certain DT/T-Mobile subsidiaries and affiliates, including those held by Iowa Wireless. As further detailed below, Iowa Wireless is an indirect, majority-owned subsidiary of T-Mobile, and Iowa Wireless’s wireless licenses and Section 214 authorization are among those that are the subject of the Application.¹ Iowa Wireless’s submission is not a Petition to Deny in the traditional sense in that it is not asking the Commission for an outright denial of the Application. Rather, Iowa Wireless files this Petition to highlight to the FCC important issues that will impact wireless services currently being provided by Iowa Wireless to customers in predominantly rural areas in Iowa. If the Commission determines that consenting to the Application is appropriate and in the public interest, Iowa Wireless requests that the FCC

¹ The wireless licenses and authorizations are held by Iowa Wireless Services Holding Corporation. *See Public Notice*, DA 11-799 (rel. Apr. 28, 2011) (Iowa Wireless licenses and authorization being transferred: File No. 0004703157, lead call sign KNLG769; File No. 6015ALSL11, lead lease ID No. L000001014; File No. 6016CWSL11, lead lease ID No. L000001109; File No. 0004698766, lead lease ID No. L000007750; File No. ITC-T/C-20110421-00109, Section 214 authorization No. ITC-214-20020513-00251).

consider conditioning such consent on AT&T's agreement to certain commitments that will ensure the continued viability and provision of advanced, high quality wireless telecommunications services to rural subscribers in Iowa.

In support hereof, the following is respectfully shown:

I. BACKGROUND

Founded in 1997, Iowa Wireless is headquartered in Urbandale, Iowa (a suburb of Des Moines, Iowa). The company is an FCC licensee that holds broadband PCS and AWS authorizations and spectrum leases to provide service throughout the Des Moines-Quad Cities Major Trading Area (MTA032), and Section 214 authorization to provide international telecommunications service.² Iowa Wireless Services Holding Corporation is a wholly owned subsidiary of Iowa Wireless Services, LLC ("IWS-LLC"), which is composed of two members: INS Wireless, Inc. ("INSW") (a wholly owned subsidiary of Iowa Network Services, Inc.) and VoiceStream PCS I Iowa Corporation ("VoiceStream PCS"). DT, a German company, holds a 54 percent indirect foreign ownership interest in IWS-LLC and its affiliate, Iowa Wireless Services Holding Corporation. Specifically, through a series of intermediate subsidiaries, DT holds a 100 percent ownership interest in T-Mobile, which in turn indirectly holds a 100 percent ownership interest in VoiceStream PCS. INSW and VoiceStream PCS each holds a 46 percent and 54 percent interest in IWS-LLC, respectively. DT, through its indirect ownership interests in T-Mobile and VoiceStream PCS, is authorized by the Commission to hold up to a 60 percent interest in Iowa Wireless.³

² See n.1, *supra*.

³ *Iowa Wireless Services Holding Corporation, Petition for Declaratory Ruling*, Public Notice, 21 FCC Rcd 14739 (2006).

Iowa Wireless has over 250 full-service company stores and authorized dealers across Iowa, western Illinois, and eastern Nebraska. Iowa Wireless provides voice and data communications to subscribers using the GSM air interface for voice services, and, where available, the 3G UMTS/HSPA protocol for broadband wireless services. Iowa Wireless was created with the primary purpose of providing advanced, high quality telecommunications services in rural areas, and its network serves the vast majority of the state of Iowa, as well as a few adjacent areas in neighboring states. Some of the rural areas licensed to Iowa Wireless do not have the necessary subscriber densities or potential returns on investment to attract large carriers to invest in the infrastructure (e.g., towers, base stations, backhaul, attendant communications equipment, and customer support) required to serve residents in those locations.

In order to fulfill its mission of serving rural subscribers, Iowa Wireless has close contractual relationships with 76 small independent telephone companies (“ITCs”) to extend the reach of its network to include remote rural areas. Iowa Wireless partitioned and disaggregated spectrum and market areas to the ITCs, and they invested considerable capital and other resources to construct wireless networks to serve their local communities. Iowa Wireless also partnered with T-Mobile so that its customers would have nationwide access to a ubiquitous GSM/UMTS network with voice and high speed data communications capabilities. Iowa Wireless and the ITCs have invested heavily in PCS and AWS spectrum, and GSM and 3G UMTS/HSPA infrastructure, equipment, and handsets to ensure that their rural constituents have the same ability to roam and have access to wireless services to the same extent as their urban and suburban counterparts.

Iowa Wireless and T-Mobile’s partnership has worked well, and subscribers have clearly benefitted from Iowa Wireless’s focus on serving rural customers and from T-Mobile’s position

as a nationwide wireless carrier. Since the announcement of the AT&T/T-Mobile transaction, Iowa Wireless has not been able to obtain any information regarding how – if at all – AT&T will incorporate Iowa Wireless into its long-term plans, nor has Iowa Wireless been able to determine what impact, if any, the transaction will have on Iowa Wireless’s rural customers with respect to continued network access at reasonable rates. AT&T asserts that it is unable to discuss these operational issues prior to consummation of the transaction due to concerns about prohibited premerger coordination. Iowa Wireless respectfully disagrees, and believes that such discussions are essential to its customers and will not violate the antitrust laws so long as they are properly structured and monitored.

AT&T has recently communicated to Iowa Wireless that AT&T will, consistent with its practice in similar transactions, honor any contractual and legal obligations arising out of the T-Mobile acquisition, and that AT&T will work cooperatively with Iowa Wireless to address any concerns that may arise post-closing. However, in light of AT&T’s concerns about premerger coordination relating to commitments regarding Iowa Wireless, its operations, or the service provided to rural customers, there remain critical open issues that have not been addressed or resolved by AT&T or Iowa Wireless at this time. Accordingly, in order to ensure that rural subscribers are not adversely impacted by the proposed transaction, Iowa Wireless requests that the Commission condition its consent on AT&T’s agreement to meet certain commitments with respect to the issues discussed below.

II. DISCUSSION

A. Commitment to Provide Broadband Services to Rural Customers

AT&T provides broadband service to its subscribers using various 2G and 3G protocols, which include GPRS, EDGE, and UMTS/HSPA. For its next generation broadband offering, AT&T is migrating to 4G LTE technology. In the Introduction and Summary attached to the

lead application, AT&T states that it is “acquiring T-Mobile USA, a Deutsche Telekom subsidiary with declining market shares and no clear path to Long Term Evolution (LTE), the gold standard for advanced mobile broadband services.”⁴ AT&T further states that it “faces network spectrum and capacity constraints more severe than those of any other wireless provider, and this merger provides by far the surest, fastest, and most efficient solution to that challenge” because the “network synergies of this transaction will free up new capacity . . . in the many . . . rural wireless markets.”⁵ Over time, AT&T plans to transition its own services as well as T-Mobile’s HSPA services to LTE,⁶ and address “continuing capacity needs through the ramping down of GSM networks,” and “the fuller deployment of efficient, capacity-increasing LTE technologies”.⁷ Indeed, AT&T commits to deploying LTE to more than 97.3 percent of the U.S. population.⁸

AT&T states that the transaction and access to additional spectrum will “give rural residents access to efficient, fast, and reliable broadband connections that they might otherwise lack altogether.”⁹ It is unclear to Iowa Wireless how AT&T plans to do that. What is clear is that AT&T plans to repurpose T-Mobile’s spectrum in order to provide LTE, and to discontinue legacy UMTS/HSPA service. Constructing wireless networks in rural areas is an extraordinarily expensive undertaking – particularly when towers are deployed in remote locations capable of serving, at times, only a few farmhouses. Iowa Wireless and the ITCs have made the

⁴ See File No. 0004669383, FCC Form 603, Exhibit “Description of Transaction, Public Interest Showing, and Related Demonstrations” at 1.

⁵ *Id.*

⁶ *Id.* at 8.

⁷ *Id.* at 34.

⁸ *Id.* at 10, n.9.

⁹ *Id.* at 56.

commitment to serve those areas, and they have invested in 3G UMTS/HSPA technology, deployed compatible equipment throughout the state of Iowa, and distributed thousands of handsets to rural subscribers that enable them to enjoy broadband access not only in Iowa, but also throughout the country by way of roaming on T-Mobile's compatible network. Once AT&T transitions all of T-Mobile's spectrum and services to LTE, Iowa Wireless and the ITCs will become a wireless digital broadband island, whereby rural customers can only use their devices in rural areas. Given the high cost of network construction in rural areas, Iowa Wireless is often the only GSM carrier with sufficient coverage that is able to provide service to wireless users traveling to or through remote areas in Iowa, and AT&T/T-Mobile subscribers that used to be able to use Iowa Wireless's services will no longer be able to do so once they are transitioned to LTE.

The "wireless digital broadband island" extends not only to data services, but also to voice services as well. "AT&T projects that it will use its cellular and PCS spectrum holdings to support GSM services and UMTS for a number of years" ¹⁰ However, "LTE uses an Internet Protocol ("IP") based architecture, which, among other things, can carry voice over IP and data in the same channel, allowing for more efficient carriage of traffic and new and innovative converged applications that use both voice and data." ¹¹ As mentioned above, Iowa Wireless and the ITCs have made significant capital expenditures to bring wireless services to rural underserved area in Iowa. Iowa Wireless and the ITCs have only recently started to deploy 3G UMTS/HSPA services in Iowa, and they are doing so because of the compatible technology used by T-Mobile. When AT&T shuts down T-Mobile's GSM and UMTS network in favor of an all-LTE solution for both voice and data services, Iowa Wireless and the ITC's GSM and 3G

¹⁰ *Id.* at 14.

¹¹ *Id.*

broadband facilities will become stranded investments due to their incompatibility with AT&T's chosen technology.

Some ITCs that have not yet started to deploy wireless broadband in their communities are now reluctant to do so due to the uncertainty associated with AT&T's plans to move T-Mobile's network away from UMTS/HSPA. Furthermore, the ITCs that have made investments to deploy UMTS/HSPA are concerned that they may have chosen the "Betamax" of 3G technologies given that there will be no compatible nationwide carrier in a few years. In order to encourage the continued deployment of high-speed wireless broadband services in rural areas, and to avoid cutting off rural customers from voice and data services when they travel outside of their home markets, Iowa Wireless proposes that, as a condition for FCC consent to the Application, AT&T be required to maintain the legacy T-Mobile GSM and UMTS/HSPA networks until such time as Iowa Wireless and the ITCs can transition to the technology path chosen by AT&T for LTE deployment. Iowa Wireless cannot predict when it would be able to transition to LTE, particularly when Iowa Wireless and the ITCs have only recently started to offer 3G service. However, the public interest certainly favors the maintenance of legacy service for rural subscribers to ensure that they will have seamless access to voice and broadband communications, regardless of whether they are in their home rural markets, or visiting populated urban areas, and to avoid saddling Iowa Wireless and rural carriers with stranded investments that would otherwise have no use outside of rural markets.

B. Commitment to Provide Roaming Services to Rural Customers

Iowa Wireless, T-Mobile, and AT&T have roaming agreements in place that permit their customers to roam on each other's respective networks.¹² As discussed previously, Iowa

¹² In markets outside of Iowa Wireless's service area where both T-Mobile and AT&T operate, T-Mobile is the preferred roaming partner for Iowa Wireless's customers.

Wireless subscribers depend on T-Mobile (and AT&T where T-Mobile does not operate) for roaming services in areas outside of Iowa Wireless's service footprint. In Iowa, those areas generally include the city of Des Moines and surrounding counties, and Iowa Wireless subscribers also roam on T-Mobile's network outside the state. While AT&T will honor T-Mobile's roaming agreements, they will eventually expire and will need to be renegotiated or renewed.

The requirement for AT&T to maintain the legacy T-Mobile voice and data networks is meaningless if Iowa Wireless's subscribers cannot access roaming services pursuant to reasonable terms and conditions. Therefore, in addition to the requirement for AT&T to maintain the T-Mobile's legacy network, Iowa Wireless requests that the FCC condition consent to the Application on AT&T's agreement to provide roaming services to Iowa Wireless and its customers pursuant to rates, terms, and conditions that are reasonable and comparable to the rates, terms and conditions that are offered to other AT&T roaming partners, or pursuant to the terms of Iowa Wireless's existing roaming agreement with T-Mobile. AT&T should also be required to provide roaming services that is compatible with Iowa Wireless's voice and data technologies as Iowa Wireless transitions to more advanced 3G services. To the extent that an AT&T customer is capable of voice and/or data roaming on Iowa Wireless's network, Iowa Wireless also asks that the Commission condition its approval on AT&T's agreement to roam on a bilateral basis, i.e., AT&T must permit its customers to roam on Iowa Wireless's network. Iowa Wireless further requests that it be given the option to continue to operate under the existing roaming agreement if the parties cannot agree on terms of a new roaming arrangement to avoid loss of roaming capabilities by rural customers.

C. Commitment to Make Compatible Handsets Available to Rural Customers

Large Tier I carriers, such as Verizon, AT&T, T-Mobile, and Sprint can quickly obtain the latest, and often customized, handsets directly from equipment manufacturers. As a Tier III carrier, Iowa Wireless does not have the capability to influence the production and distribution timetables of handset manufacturers, such as Apple, HTC, Motorola, Nokia, and Samsung. Small Tier III carriers do not have sufficient purchasing power to buy handsets directly from the manufacturers, and instead, they must procure them from authorized U.S. distributors. Those distributors are often unable to make certain handsets available quickly to Tier III carriers if manufacturers have given priority to Tier I carriers.

Given the disparity in market power between AT&T and Iowa Wireless, and AT&T's professed plan to transition T-Mobile's network away from GSM and UMTS/HSPA, it is vital that Iowa Wireless's customers have access to handsets that will enable them operate on both home and roaming networks so that customers will have continuous access to voice and data communications. Accordingly, Iowa Wireless requests that the Commission condition consent to the Application on AT&T's agreement to work with manufacturers to make handsets compatible with both Iowa Wireless and AT&T's networks available on a timely basis, and in sufficient quantities to meet the handset demands of Iowa Wireless's subscribers.

D. Commitment to Make Spectrum Available in Rural Areas

As discussed above, it appears that AT&T intends to repurpose T-Mobile's spectrum for LTE use. Iowa Wireless and the ITCs have made significant investments in spectrum to bring GSM and 3G UMTS/HSPA service to rural communities in Iowa. AT&T will become a majority owner of Iowa Wireless if the proposed transaction is approved. It is unclear how AT&T's ownership stake in Iowa Wireless will affect the governance or ultimate control of Iowa

Wireless post-closing. However, it is conceivable that AT&T will be able to leverage its interest to obtain spectrum from Iowa Wireless for LTE and other uses.

The ITCs are independent operators in which neither Iowa Wireless nor T-Mobile have any ownership interest, and they operate at arms-length from Iowa Wireless. They have purchased spectrum from Iowa Wireless and constructed networks compatible with those of Iowa Wireless and T-Mobile with the express purpose of enabling rural wireless customers to access voice and data services not just locally, but also on a state and nationwide basis. Iowa Wireless and the ITCs need assurance that there will be adequate spectrum available for their rural subscribers to continue to access voice and data services both at home and on a roaming basis. Accordingly, Iowa Wireless requests that the Commission condition its consent to the Application on AT&T's agreement that it will not seek to repurpose Iowa Wireless's spectrum for LTE or other purposes until such time as Iowa Wireless, the ITCs, and their customers are ready and able to transition to such services.

E. Commitment to Resolve Operational Issues with Iowa Wireless

The last issue that Iowa Wireless seeks to raise in this Petition may be one of the thorniest to resolve. In addition to its own network development efforts, Iowa Wireless work in conjunction with 76 ITCs to install network facilities in their respective communities in order to more quickly deploy advanced wireless telecommunications services in rural areas. This joint effort necessitated that significant resources be dedicated to building out a rural wireless network to underserved communities in Iowa - resources that Iowa Wireless and the ITCs would be unwilling to invest if it faced the prospect of being overbuilt by T-Mobile. Accordingly, at the time, T-Mobile agreed that it would not duplicate its affiliate's construction efforts, and undermine the investment and efforts used for the deployment of wireless voice and broadband services in underserved rural areas. AT&T's acquisition of T-Mobile, if approved, will affect

this essential agreement that enabled Iowa Wireless and the ITCs to bring and expand wireless services to rural areas of Iowa. It is unclear at this time whether AT&T will - or even can - honor this agreement going forward.

Moreover, the proposed acquisition has already impacted Iowa Wireless's day-to-day operations. Iowa Wireless's plans to acquire part of T-Mobile's spectrum in more populated areas of the state have been put on hold as a result of the proposed transaction. Furthermore, many ITCs are sitting on the sidelines and waiting to see what AT&T will do before deciding whether to dedicate additional investment and resources in what ultimately could prove to be "dead end 3G" wireless technology. The chilling effect that AT&T's proposed acquisition has on the continued deployment and advancement of wireless services in rural areas already is being felt, and Iowa Wireless and the ITCs need assurance that their construction efforts will not be wasted. Therefore, in addition to the other commitments set forth herein, Iowa Wireless requests that the Commission also condition its consent on AT&T's agreement that it adhere to existing agreements between Iowa Wireless and T-Mobile, and not negate the enormous investment that Iowa Wireless and the ITCs have made in Iowa's rural communities by undermining the technology currently deployed.

III. CONCLUSION

Throughout its Application, AT&T makes references to how its acquisition of T-Mobile will benefit rural subscribers through network synergies that will free up additional spectrum that can be used by AT&T for LTE. However, for rural carriers, such as Iowa Wireless and the ITCs, that have already made significant capital expenditures to purchase spectrum and network facilities that are compatible with T-Mobile's existing GSM and UMTS/HSPA network, the promise of LTE is cause for alarm. AT&T has not provided a clear path for Iowa Wireless and

the ITCs to transition their networks and subscribers to LTE, which would leave Iowa Wireless subscribers with wireless service that is only usable in rural locations in Iowa.

Iowa Wireless understands that AT&T must be careful not to engage in prohibited premerger coordination prior to consummation of the transaction, but Iowa Wireless submits that basic operational issues such as those described above are essential to ensuring continued service to Iowa Wireless's customers and must be addressed prior to approval. Otherwise, there will be no assurance that rural customers in Iowa that currently receive high quality voice and broadband data services will continue to do so going forward. Iowa Wireless does not ask the Commission to deny AT&T's Application on an absolute basis. Rather, Iowa Wireless requests that the FCC also require AT&T to agree to the commitments set forth herein, and such other commitments that the FCC determines that are necessary to foster the continued provision and expansion of wireless services in rural areas, should the FCC determine that the transaction is in the public interest.

Respectfully submitted,

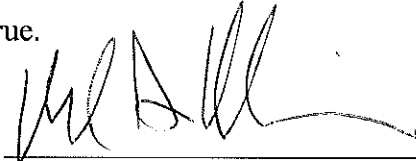
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Counsel for Iowa Wireless Services, LLC

Date: May 31, 2011

CERTIFICATION

I, Michael S. Haskins, hereby certify under penalty of perjury that I am the Chief Operating Officer of Iowa Wireless, LLC, which is the parent company of Iowa Wireless Services Holding Corporation; that I am authorized to make this certification on behalf of both companies; that I have read the foregoing document and know the contents thereof; and that the same are true of my own knowledge, except to those matters therein stated upon information and belief, and as to those matters I believe them to be true.



Michael S. Haskins
Chief Executive Officer/
Chief Operating Officer
Iowa Wireless, LLC

5/3/2011

Date

CERTIFICATE OF SERVICE

I, Monica Gibson-Moore, a Legal Administrative Assistant with Venable LLP, certify that on this 31st day of May, 2011, that a true and correct copy of the foregoing Petition to Deny was served on the following:

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