



**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington DC 20554**

March 12, 2010

*Via First Class Mail and E-mail/Facsimile*

Joseph A. Stroud, Chairman  
Telephone USA Investments, Inc.  
18600 S. Oak Avenue  
Tinley Park, IL 60477

Re: Applications of Atlantic Tele-Network, Inc. and Cellco Partnership d/b/a Verizon Wireless for Consent To Assign or Transfer Control of Licenses and Authorizations (WT Docket No. 09-119)

Dear Mr. Stroud:

Atlantic Tele-Network, Inc. and certain of its subsidiaries ("ATN") and Cellco Partnership d/b/a Verizon Wireless and certain of its subsidiaries ("Verizon Wireless," and together with ATN, the "Applicants") have filed a series of applications pursuant to Sections 214 and 310(d) of the Communications Act of 1934, as amended.<sup>1</sup> In these applications, the Applicants seek Commission approval for the assignment or transfer of control of certain wireless licenses and related authorizations from subsidiaries of Verizon Wireless to a holding company to be indirectly owned by ATN.<sup>2</sup> Your company, Telephone USA Investments, Inc. ("Telephone USA") has filed a petition to deny these applications. In order for the Commission to complete its review of the applications and make the necessary public interest findings under Section 310(d) of the Communications Act,<sup>3</sup> we are requesting additional information and clarification of certain matters discussed in the applications and the Telephone USA petition to deny.

Accordingly, pursuant to Section 308(b) of the Act,<sup>4</sup> we request that you provide written responses, and supporting documentation, to each request set forth in the attachment below. Each response or document should clearly indicate the specific question or request to which it responds, and each page should be marked with a corporate identification and consecutive document control numbers. We would appreciate receiving your response to each inquiry no later than March 22, 2010. We may follow up with additional requests for information based upon your responses.

---

<sup>1</sup> 47 U.S.C. §§ 214, 310(d).

<sup>2</sup> See Atlantic Tele-Network, Inc. and Cellco Partnership d/b/a Verizon Wireless Seek FCC Consent To Assign or Transfer Control of Licenses and Authorizations, WT Docket No. 09-119, *Public Notice*, 24 FCC Rcd 9035 (2009) ("*Comment Public Notice*").

<sup>3</sup> 47 U.S.C. § 310(d).

<sup>4</sup> 47 U.S.C. § 308(b).

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, in WT Docket No. 09-119. In addition, the *Comment Public Notice* and the *Protective Order* require the submission of multiple copies of all *ex parte* and other filings submitted in this proceeding.<sup>5</sup> The Wireless Telecommunications Bureau also should receive, at a minimum, two copies of all paper filings. If you submit information pursuant to the *Protective Order* issued in this case, you should deliver to Kathy Harris of the Wireless Telecommunications Bureau two copies of the unredacted documents marked “Confidential Information – Subject to Protective Order in WT Docket No. 09-119 before the Federal Communications Commission” and two copies of the redacted documents marked “Redacted – For Public Inspection.”<sup>6</sup> For any electronic filings made using the Commission’s Electronic Comment Filing System (“ECFS”), please serve the documents via e-mail to Kathy Harris, [kathy.harris@fcc.gov](mailto:kathy.harris@fcc.gov), and to Stacy Ferraro, [stacy.ferraro@fcc.gov](mailto:stacy.ferraro@fcc.gov).

If you have any questions regarding this matter, please contact Kathy Harris, Wireless Telecommunications Bureau, at (202) 418-0609.

Sincerely,

Ruth Milkman  
Chief, Wireless Telecommunications Bureau

Attachment

cc: John R. Feore, Esq.  
Joshua Pila, Esq.  
Vicki Iseman

---

<sup>5</sup> See *Comment Public Notice* at 3-4; Applications of Atlantic Tele-Network, Inc. and Celco Partnership d/b/a Verizon Wireless for Consent To Assign or Transfer Control of Licenses and Authorizations, WT Docket No. 09-119, *Protective Order*, DA 09-2448 (WTB rel. Nov. 19, 2009) (“*Protective Order*”).

<sup>6</sup> See *Protective Order* at 2 ¶ 5.

**ATN/Verizon Wireless-ALLTEL Divestiture Trust**  
**WT Docket No. 09-119**  
**Information Request**  
**March 12, 2010**

Requested Documents and Information:

Telephone USA filed a Petition to Deny on August 10, 2009 in WT Docket No. 09-119. On page 2 of the Petition to Deny, Telephone USA states that it was an active participant in the bidding process for the Divestiture assets subject to the instant proceeding. On page 3 of the Petition to Deny, Telephone USA refers to its June 8, 2009 “timely submitted bid with no contingencies.”

1. Please provide copies of all correspondence with Verizon Wireless or its agents demonstrating that Telephone USA was an active participant in the bidding process.
2. Please provide a copy of all final bid documents submitted by Telephone USA for the licenses subject to this proceeding.
3. Please provide copies of any documents demonstrating Telephone USA’s committed funding of the purchase price for the licenses subject to this proceeding and explain how these documents address the claim by the Applicants that Telephone USA did not provide “any evidence of committed funding, a credible path to obtain funding, or cash on hand sufficient to support the purchase price” for the licenses subject to this proceeding.<sup>7</sup>

---

<sup>7</sup> Joint Opposition of Atlantic Tele-Network, Inc. and Verizon Wireless to Petitions to Deny, WT-Docket 09-119, filed Aug. 20, 2009, at 20 n.58.