



FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

August 8, 2011

Via First Class Mail and E-mail

Michael P. Goggin
AT&T Mobility Spectrum LLC
1120 20th Street, N.W., Suite 1000
Washington, D.C. 20036

Dean Brenner
QUALCOMM Incorporated
1730 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Re: Applications of AT&T Mobility Spectrum LLC and QUALCOMM Incorporated for Consent
To Assign Lower 700 MHz Band Licenses (WT Docket No. 11-18)

Dear Messrs. Goggin and Brenner:

We currently have pending before us the application of AT&T Mobility Spectrum LLC (“AT&T”) and QUALCOMM Incorporated (“Qualcomm,” and together with AT&T, the “Applicants”) to assign licenses from Qualcomm to AT&T,¹ which has today reached 180 days on the Commission’s informal timeline for consideration of merger applications.² As you are aware, the Commission has been evaluating for some time³ the relationship between this proposed transaction and AT&T’s proposed acquisition of T-Mobile USA (“T-Mobile”).⁴ The Commission’s ongoing review has confirmed that the proposed transactions raise a number of related issues, including, but not limited to, questions regarding AT&T’s aggregation of spectrum throughout the nation, particularly in overlapping areas. As a result, we have concluded that the best way to determine whether either or both of the proposed transactions serve the public interest is to consider them in a coordinated manner at this time, without prejudice to independent treatment at a later date.⁵

¹ See AT&T Mobility Spectrum LLC and QUALCOMM Incorporated Seek FCC Consent to the Assignment of Lower 700 MHz Band Licenses, WT Docket No. 11-18, *Public Notice*, DA 11-252 (rel. Feb. 9, 2011) (“Comment Public Notice”).

² See Informal Timeline for Consideration of Applications for Transfers or Assignments of Licenses or Authorizations Relating to Complex Mergers, <http://www.fcc.gov/encyclopedia/informal-timeline-consideration-applications-transfers-or-assignments-licenses-or-autho> (last visited Aug. 8, 2011).

³ See, e.g., *Letter to Michael P. Goggin, AT&T Mobility Spectrum LLC, WT Dkt. No. 11-18 (dated May 20, 2011)*; *Letter to Dean Brenner, QUALCOMM Incorporated, WT Dkt. No. 11-18 (dated May 20, 2011)*.

⁴ Applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or transfer control of licenses and authorizations, WT Docket No. 11-65.

⁵ Thus, the Commission is not at this time taking the further step of formally consolidating the two transactions. See Joint Motion To Consolidate filed by Cincinnati Bell Wireless, LLC, Metro PCS Communications, Inc., NTELOS, the Rural Cellular Association, the Rural Telecommunications Group, and Sprint Nextel Corporation, WT Dkt. No. 11-65, et al. (filed Apr. 27, 2011).

Reflecting the interdependence of our ongoing review of the proposed transactions, we are stopping the Commission's informal 180-day clock for the above-referenced proposed transaction effective today.

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, appearing to read "Rick Kaplan", with a long horizontal stroke extending to the right.

Rick Kaplan
Chief, Wireless Telecommunications Bureau

cc: Peter J. Schildkraut, Arnold & Porter LLP
Paul Margie, Wiltshire & Grannis LLP