

**CONCURRING STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: Applications of AT&T, Inc. and Centennial Communications Corp. for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Leasing Arrangements, WT Docket No. 08-246.

This transaction does not appear to be the vehicle for major changes in the Commission's approach to mergers in the wireless sector. For many years now I have expressed concern over the rising tide of economic concentration in our telecommunications and media industries. But the tide continued to run through those years. Consumers have paid a heavy cost, in terms of dollars, confusion and constricted services, because the FCC permitted—even encouraged—this concentration to happen. In both theory and practice, too much power in too few hands is not a good prescription for America's communications future.

Regarding the instant transaction—which is clearly on a fast track for approval—I believe the ameliorative requirements imposed by the Department of Justice for divestiture in eight markets significantly improve the original terms of this merger. Additionally, AT&T says it is committed to moving Centennial customers to newer generation wireless technologies currently unavailable to most of them. While the company's assertion that it will do this lacks solid commitment, there do appear to be market incentives at work to encourage the redemption of some of these promises. I will be closely monitoring the implementation of this transaction with an eye to ensuring that Centennial subscribers do in fact experience the tangible benefits they are entitled to expect—next generation wireless services, accelerated provision of broadband, and other up-to-date customer services. That being said, I continue to be skeptical of commercial marriages based on pledges that big companies “go rural” for better or for worse. Too many rural areas have been abandoned when the marriage didn't produce the big company profits sought by the market.

The competitive analysis employed in this merger review is certainly an improvement over the often-careless methodology applied in other recent wireless transactions. For instance, the ever-shifting and somewhat out-of-control spectrum screen employed by the last Commission is not generally invoked here. Nonetheless that process still stands, and I reiterate my concern with the screen as it exists. I applaud the Chairman for addressing this matter in the recently-issued Wireless Competition NOI which will hopefully result in changes in the way this Commission analyzes the competitive effects of proposed transactions—changes that I have been encouraging since almost the inception of the screen. I hope the NOI will lead to *expeditious change* because more mergers mean less competition.

For the reasons described above, I limit my vote on this item to a concurrence.