

NENA

The 9-1-1 Association

4350 North Fairfax Drive | Suite 750 | Arlington, VA 22203-1695

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

July 8th, 2011

RE: *In the Matter of 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.

Dear Madam Secretary:

As custodians of the United States' emergency calling system, the members of the National Emergency Number Association (NENA) have a keen professional interest in the availability of wireless spectrum for consumers and field responders, and in the reliability of wireless networks. Our mission charges us with fostering the technological advancement, availability, and implementation of a universal emergency telephone number system. As telecommunications evolves, NENA works to foster the discovery and adoption of technological advancements that improve public safety and our ability to communicate in times of emergency.

With this in mind, I write today concerning the proposed merger of AT&T and T-Mobile USA. NENA believes this merger will benefit the public safety and emergency response community as well as the public-at-large by speeding the build-out and expanding the footprint of the combined entity's advanced LTE network. As the Commission recommended in the National Broadband Plan, both congress and the White House are actively working on plans to provide nation-wide LTE service for emergency responders. While the combined AT&T/T-Mobile network will operate in spectrum distinct from that of public safety services, the proposed merger will nonetheless produce economies of scale and scope in the market for LTE-capable infrastructure and equipment that will reduce the overall cost of providing service to the public safety community.

Similarly, the build-out that will occur with the merger will speed the availability of wireless broadband service to tens of millions of Americans, particularly in rural areas where broadband competition is desperately needed. As we begin the transition to Next Generation 9-1-1, wireless broadband service will play a pivotal role in providing ubiquitous and reliable access to multimedia-based 9-1-1 services. NENA is convinced that the combined entity will provide more Americans with greater levels of service on a shorter time scale than either of the pre-merger companies could on its own.

Perhaps most importantly, however, AT&T has strongly supported the deployment and improvement of 9-1-1 service for decades. In the late 1960s, AT&T played a major role in the selection of 9-1-1 as the national emergency calling number and established a policy of absorbing the cost of central office changes required to provide 9-1-1 service into its general rate base. Later, AT&T supported the deployment of Enhanced 9-1-1 service, allowing telecommunicators to locate emergency callers using service address information held by

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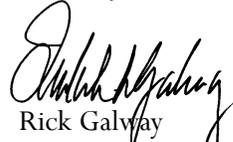
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local exchange carriers. Most recently, AT&T has participated in NENA's development of Next Generation 9-1-1 standards, demonstrating its continued commitment to the advancement of emergency communications technology.

For these reasons, NENA endorses the merger of AT&T and T-Mobile USA, and calls on the Commission to approve the applications quickly and consent to the requested transfers and assignments.

Sincerely,



Rick Galway
Executive Board President

RG:tf

cc: Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn