

## DESCRIPTION OF TRANSACTION AND PUBLIC INTEREST STATEMENT

E.N.M.R. Telephone Cooperative (“E.N.M.R.”) and Plateau Telecommunications, Incorporated (“Plateau,” and together with E.N.M.R., the “Sellers”) and Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless,” and together with the Sellers, the “Applicants”), by this and related applications, seek Federal Communications Commission (“Commission”) consent to the proposed assignment of certain licenses for spectrum within the New Mexico – 6 RSA (the “Market”) from E.N.M.R. and Plateau to Verizon Wireless.<sup>1</sup> Because this assignment will involve the transition of customers, the Applicants are also seeking partial assignment of the international Section 214 authorization held by E.N.M.R., ITC-214-20030912-00436.

Verizon Wireless will transition the customers acquired from Seller to Verizon Wireless’s service within a period of 12-15 months after closing. Verizon Wireless is experienced in customer transitions, having transitioned millions of customers to its network over the last decade, and does not anticipate this transition will negatively impact customers. As of the date of this application, Verizon Wireless anticipates that it will: transition customers to like or better price plans in terms of access and usage allowances; offer replacement handsets to the extent necessary for customers to take advantage of the full suite of Verizon Wireless services, including a variety of free and discounted devices; and on a case-by-case basis waive early termination fees if a customer does not wish to continue service with Verizon Wireless. Transitioned customers in the New Mexico 6-II RSA and the Hobbs BTA will receive service on a newly constructed Verizon Wireless 3G CDMA EVDO network. In addition, transitioned customers will also have access to Verizon Wireless 4G LTE service in the near future.

E.N.M.R. is a subscriber-owned rural telephone cooperative, providing exchange and exchange access service, mobile wireless service (through its subsidiary, Plateau) and high-speed broadband Internet service throughout eastern New Mexico and west Texas. Plateau is a wholly owned subsidiary of E.N.M.R. Plateau provides mobile wireless service in eastern New Mexico in the New Mexico 2 - Colfax, New Mexico 4 - Santa Fe, and New Mexico 6 – Lincoln, Cellular Market Areas (“CMAs”) and in west Texas in the Texas 3 – Parmer CMA pursuant to facilities owned by Plateau or E.N.M.R. or their affiliates, or partnerships managed by E.N.M.R. These markets are extremely rural, consisting primarily of open desert and prairies in seventeen (17) counties in eastern New Mexico and ten (10) counties in west Texas. Plateau’s service area in New Mexico encompasses approximately 57,893 square miles, has a population of 405,928, and a population density of approximately seven (7) people per square mile. Plateau’s service area in Texas encompasses approximately 8,901 square miles, has a population of approximately 123,726, and a population density of approximately 13.9 people per square mile.

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<sup>1</sup> These CMRS licenses include call signs KNKQ336, WQAE969, KNLH383, WQGB390 and associated microwave licenses.

Verizon Wireless is a general partnership, which is ultimately owned and controlled by Verizon Communications Inc. and Vodafone Group Plc. (“Vodafone”). Additional information as to Verizon Wireless’s ownership is provided in its Form 602, which is on file with the Commission. Vodafone’s interest in Verizon Wireless and its qualifications as a foreign corporation to hold indirect ownership interests in common carrier licenses have been previously authorized by the Commission under the Communications Act.<sup>2</sup> Neither Vodafone nor any of its foreign subsidiaries hold any direct ownership interests in any common carrier license. No changes have occurred in Verizon Wireless’s foreign ownership. Accordingly, the Commission should find that no new foreign ownership issues are raised by this filing.

Grant of this application will serve the public interest. The proposed transaction will allow Verizon Wireless to expand its voice and 3G services in the Market upon converting the 2G GSM EDGE network to 3G CDMA EVDO. In addition, acquired customers in the Market will further benefit from Verizon Wireless’s planned deployment of 4G LTE on its existing 700 MHz C Block spectrum.

Grant of this application will serve the public interest because it will enable consumers to benefit from Verizon Wireless’s expansion of its voice and 3G data network in areas of New Mexico where it does not currently offer service. Grant of this application is thus in the public interest.

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<sup>2</sup> See *In re Applications of Vodafone AirTouch Plc and Bell Atlantic Corporation, For Consent to the Transfer of Control or Assignment of License and Authorizations, Memorandum Opinion and Order*, DA 00-721 at ¶ 19 (Intl. and Wir. Tel. Burs., rel. Mar. 30, 2000); *FCC Public Notice, “International Authorizations Granted,”* Report No. TEL-00174, DA No. 99-3033 (IB and WTB, rel. Dec. 30, 1999); *In re AirTouch Communications, Inc., Transferor, and Vodafone Group, Plc., Transferee, For Consent to the Transfer of Control of License and Authorizations, Memorandum Opinion and Order*, 14 FCC Rcd 9430, ¶ 9 (WTB 1999).