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filed electronically in the docket room on 12/03/12

VIA HAND DELIVERY

Hon. James M. Allison, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration under the  
Telecommunications Act; et al.*  
Docket No. 03-00585

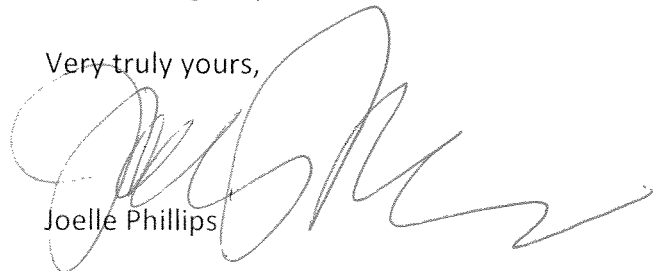
Dear Chairman Allison:

Enclosed is the Status Report of AT&T Mobility.

While the parties continue to disagree about past compensation for non-access wireless traffic exchanged prior to July 1, 2012, resolution of that issue is not necessary to establishing new interconnection agreements between the parties. Accordingly there is no need to leave open this section 252 arbitration docket to address that issue.

AT&T Mobility has no objection to withdrawing its petition to arbitrate if that will assist the Authority administratively.

Very truly yours,



Joelle Phillips

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: *Petition of Cellco Partnership d/b/a Verizon Wireless for Arbitration under the Telecommunications Act; Petition for Arbitration of BellSouth Mobility, LLC, BellSouth Personal Communications, LLC and Chattanooga MSA Limited Partnership, collectively dba Cingular Wireless; Petition for Arbitration of AT&T Wireless PCS, LLC dba AT&T Wireless; Petition for Arbitration of T-Mobile, USA, Inc., Petition for Arbitration of Sprint Spectrum LP dba Sprint PCS*

Docket No. 03-00585

**STATUS REPORT OF AT&T MOBILITY**

New Cingular Wireless PCS, LLC, and its Commercial Mobile Radio Service ("CMRS") affiliates, d/b/a AT&T Mobility,<sup>1</sup> file this Status Report in response to the Hearing Officer's instructions in the above-styled docket.

The parties have used the time since July to negotiate and have tentatively resolved all outstanding issues necessary to establish new interconnection agreements under section 252 of the Telecommunications Act. While the parties continue to disagree about past compensation for non-access wireless traffic exchanged prior to July 1, 2012,<sup>2</sup> resolution of that issue is not necessary to establishing new interconnection agreements between the parties. Accordingly there is no need to leave open this section 252 arbitration docket to address that issue. AT&T Mobility is prepared to address that separate compensation issue in an appropriate complaint docket if the RLECs want to litigate whether "true-up" of any interim compensation arrangements to the compensation required by the FCC for final interconnection agreements entitles them to any compensation other than bill-and-keep.<sup>3</sup>

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<sup>1</sup> Since this docket was filed, Cingular Wireless and AT&T Wireless have merged and now do business as AT&T Mobility.

<sup>2</sup> See previously-filed "Comments of Joint CMRS Providers."

<sup>3</sup> Ironically, had the RLECs billed and received the interim compensation directed by the TRA, the RLECs would be obligated to return it to the CMRS Providers under FCC true-up rules. However, because the parties have operated at bill-and-keep, there is simply no need for "true-up."

As stated in previous comments, further action in this docket would be a needless waste of TRA time and resources. It makes little sense for the Authority to reopen this docket for a lengthy cost proceeding to establish rates that would ultimately need to be “trued-up” to bill and keep anyway. Such a proceeding would be a significant waste of resources of the Authority and all parties.

For all of these reasons, the Authority should close this docket without taking further action. In the alternative, if the Authority feels that simply closing the docket is not sufficient to adjudicate the rights of the parties, the Authority should enter a final order in this Docket, ruling as a matter of law, consistent with the recent FCC orders and the existing *de facto* bill-and-keep arrangement, that any interim compensation owed to any of the parties would ultimately be trued up to bill-and-keep compensation and therefore the Authority designates bill and keep as the appropriate compensation for traffic during this period. AT&T Mobility has no objection to withdrawing its petition to arbitrate if that will assist the Authority administratively.

Respectfully submitted,

AT&T MOBILITY

By: 

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## CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2012, a copy of the foregoing document was served on the parties of record, via the method indicated:

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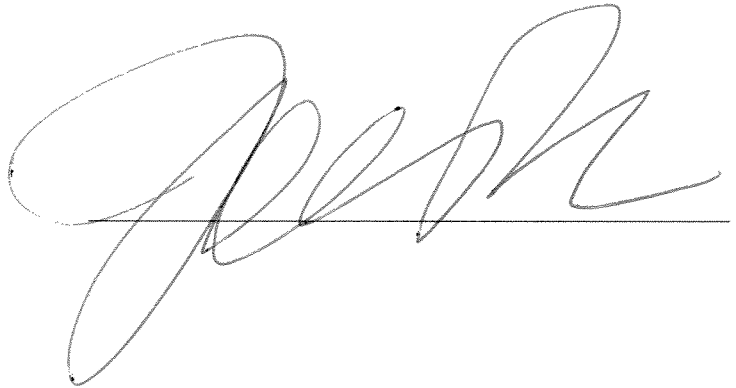
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A handwritten signature in black ink, appearing to read 'Leon Bloomfield', is written over a horizontal line. The signature is fluid and cursive, with a large initial 'L' and 'B'.