cingular WIRELESS

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October 18, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Presentation
AT&T Wireless Services, Inc. and Cingular Wireless Corporation
WT Docket No. 04-70, DA 04-932, File No. 0001656065 *et al.*

Dear Ms. Dortch:

This letter is submitted pursuant to Section 1.1206(b) of the Commission's rules to report that on October 15 & 18, 2004, the undersigned provided written responses to specific questions posed by FCC staff. Attached to this notice are the questions and Cingular's responses.

If you have any questions concerning this notice, please let me know.

Respectfully submitted,

/s/ Brian F. Fontes
Brian F. Fontes
Vice President, Federal Relations

CINGULAR'S RESPONSES TO FCC QUESTIONS

(1) What is the date on which the number of subscribers is counted? In particular, in your data reported for April 2004, is the subscriber count as of the end of the month (April 30), the beginning of the month (April 1), or some other relevant date in the middle of the month?

A: The last day of the month.

(2) Are subscribers of affiliated facilities-based carriers included or excluded in your data? In particular, can you tell me what affiliated carriers are included and excluded? Please confirm whether or not subscribers from the following companies are included in the data have sent us (and, of course, whether there are any others):

FTC Wireless
Beach Holding Co.
Salmon PCS
CCPR Companies
Horry Telephone
Texas RSA 19 LP
Comporium Wireless
CT Communications
Unwired Telecom Corp. (formerly US Unwired)
North State Wireless

A: The following entities are included in the data.

Puerto Rico entities:

Beach Holding Co. - Cingular performs billing on their behalf.

CCPR Companies (Assumes these are the Puerto Rico companies and Beach Holding Inc. is the holding company). - Cingular's indirect equity in CCPR/Beach equals 47%; however, Cingular controls the CCPR/Beach entities.

Others:

Salmon PCS - Cingular performs billing on their behalf. In accordance with FIN 46, Cingular consolidated Salmon into Cingular's financials effective January 1, 2003. Salmon's subscribers are included in the data delivered to the FCC.

Unwired Telecom Corp. (formerly US Unwired) - Cingular purchased certain assets and customers from this Company on February 6, 2004. Thus, those subscribers became

Cingular subscribers in February 2004 and they were included in the month ending April 2004 data delivered to the FCC.

Texas RSA 19 LP - Cingular performs billing on their behalf. Its subscribers are not included in the data delivered to the FCC.

In addition, attached below please find a spreadsheet that lists the non-wholly owned entities for which Cingular bills. The subscribers of these entities are included in the data delivered to the FCC along with all of the entities in which Cingular wholly owns.

Subscribers for the following entities – the Carolinas Partitioners – are not included in the data delivered to the FCC):

> FTC Wireless - (Assumes this is the same entity as Farmers Telephone Company) Carolinas Partitioner. Cingular provides billing records. The Partitioner generates its own billing.
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> Horry Telephone - Carolinas Partitioner. Cingular provides billing records. The Partitioner generates its own billing.
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> Comporium Wireless - Carolinas' Partitioner. Cingular provides "bill-ready" format referred to as "Full Desk Top." Billing information is sent to the Partitioner in a format that is ready for them to print the invoices.
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> CT Communications (Assumes this is the same entity as Concord Telephone Company) - Carolinas' Partitioner. Cingular provides "bill-ready" format referred to as "Full Desk Top". Billing information is sent to the Partitioner in a format that is ready for them to print the invoices.
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> North State Wireless - Carolinas Partitioner. Cingular provides billing records. The Partitioner generates its own billing.

Finally, Customers that combine their wireless bill with landline services from SBC and BellSouth are included. There are no subscribers of landline services alone included.

(3) Are resellers of your wireless services included or excluded in your data? If included, do the zip codes for the plans of these resellers correspond to the individual subscriber's billing address or the reseller's corporate address? And can you identify the resellers included or excluded from your data?

A: Resellers' subscriber counts are included. The billing address information for resellers is for the reseller business address. For resellers, the customer type is identified by the code "reseller."

(4) Are pre-paid plans included or excluded in your data? If included, how are they listed in the data? For example, are they only listed as a one-time subscription in the month that the plan is purchased? Or are they listed as a recurring subscription without a monthly charge? How, if at all, are zip codes assigned to pre-paid accounts?

A: Pre-paid subscribers are included. For pre-paid, the customer type is identified by "Pre-paid." Billing data for pre-paid was not included since most pre-paid subscribers are not rated and decremented by the core billing systems. Pre-paid subscribers are listed every month they are active or have cancelled in that reporting month. In come of our systems, when subscribers sign up for pre-paid or move from post-paid to pre-paid, an address and zip code are captured. These are come of the pre-paid subscribers that would show billing usage in the data you have received.

(5) Are subscribers on corporate accounts included or excluded in your data? If included, do the zip codes for such corporate accounts correspond to the individual subscriber's billing address or to the corporation's billing address?

A: Corporate accounts are included and are identified as customer type "business." Zip codes are sourced from the billing address in the core billing system and will fall into three categories:

1. corporate plan / employee liable lines will typically show the zip code of the actual subscriber but may show the zip code of the corporation billing address;

2. corporate plan / corporate liable lines will almost always show the zip code of the corporation billing address; and

3. corporate plan / corporate plan / special billing provisioning will show up as a Cingular wireless address: 12555 Windward Parkway, Alpharetta, GA 30004.

Non-wholly Owned Entities and Associated Minority Ownership %	
	Miniority % Equity
Bloomington Celllular Telephone Company	5.7858%
Florida RSA No. 2B (Indian River) Limited Partners	28.5000%
Northeastern Georgia RSA Limited Partnership	65.0000%
Georgia RSA No. 2 Limited Partnership	38.7730%
Georgia RSA No. 1 Limited Partnership	25.5400%
Georgia RSA No. 3 Limited Partnership	25.0000%
Decatur RSA Limited Partnership	20.0000%
Chattanooga MSA Limited Partnership	14.7700%
Lafayette MSA Limited Partnership	49.0000%
Louisiana RSA No. 7 Cellular General Partnership	33.3000%
Acadiana Cellular General Partnership	65.0000%
Jacksonville MSA Limited Partnership	14.2400%
Louisiana RSA No. 8 Limited Partnership	50.0000%
Houma-Thibodaux Cellular Partnership	0.9900%
Detroit SMSA Limited Partnership	4.5770%
Cincinnati SMSA Limited Partnership	46.7609%
Milwaukee SMSA Limited Partnership	20.9250%
Madison SMSA Limited Partnership	14.3590%
Cingular Wireless of Texas RSA #11 Limited Partnership	36.0000%
Texas RSA 10B3 Limited Partnership	25.0000%
Texas RSA 6 Limited Partnership	50.5000%
Texas RSA 7B1 Limited Partnership	50.0000%
Texas RSA 10B1 Limited Partnership	25.0000%
Dallas SMSA Limited Partnership	0.5000%
Texas RSA 9B1 Limited Partnership	64.3800%
Texas RSA 9B4 Limited Partnership	15.3800%
Missouri RSA 8 Limited Partnership	40.0000%
Missouri RSA 11/12 Limited Partnership	50.0000%
Eastern Missouri Cellular Limited Partnership	2.0000%
Missouri RSA 9B1 Limited Partnership	49.6000%
Kansas City SMSA Limited Partnership	19.0000%
Wichita SMSA Limited Partnership	40.0000%
St. Joseph SMSA Limited Partnership	49.0000%
Topeka SMSA Limited Partnership	23.0000%
Galveston Cellular Partnership	12.6538%
Cingular Wireless of Texas RSA #16 Limited Partnership	19.2000%
Texas RSA 18 Limited Partnership	66.0000%
Texas RSA 19 Limited Partnership	66.6600%
Texas RSA 20B1 Limited Partnership	50.0000%
Cingular Wireless of Austin Limited Partnership	35.8200%
McAllen-Edinburg-Mission SMSA Limited Partnership	22.5000%
Lubbock SMSA Limited Partnership	29.0000%
Oklahoma RSA 3 Limited Partnership	26.0000%
Oklahoma RSA 9 Limited Partnership	40.0000%
Oklahoma City SMSA Limited Partnership	38.0000%
Worcester Telephone Company	9.4000%
Champaign Celltelco	1.6769%
Beach Holding Inc.	53.0000%
Salmon PCS LLC	20.6800%

Comments
Consolidated into Cingular's financials effective 1/1/2003 in accordance with FIN 46