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By ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

REDACTED – FOR PUBLIC INSPECTION

Re: Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197

Dear Ms. Dortch:

T-Mobile US, Inc. (“T-Mobile”) hereby submits the attached response to the request of the Federal Communications Commission (“Commission” or “FCC”) for data, as well as a further supplement to the Commission’s General Information and Document Request, in the above-referenced proceeding.¹ It consists of a USB drive with data and a hard drive containing items tagged as “Highly Confidential,” “Confidential,” and “Public,” per the Protective Order.² With respect to the response, T-Mobile notes the following clarifications:

- T-Mobile has provided the information requested by the Commission to the best of its ability, but there is data that has been requested that T-Mobile does not possess. In those instances, the columns are populated with zeros, nulls or “-1.” For example, because the deployed carriers in the network change frequently, T-Mobile does not keep data on the specific carriers used in the past. T-Mobile thus cannot provide the carrier center frequency for historic purposes, although it has been able to provide bandwidths in use at

¹ Letter from Donald K. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathleen O’Brien Ham, T-Mobile U.S., Inc., WT Docket No. 18-197 (Sept. 10, 2018) (“*Data Request*”); Letter from Donald K. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathleen O’Brien Ham, T-Mobile U.S., Inc., WT Docket No. 18-197 (Aug. 15, 2018) (“*Information Request*”).

² *In the Matter of Applications of T-Mobile US, Inc. and Sprint Corporation Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations*, Protective Order, WT Docket No. 18-197, DA 18-624 (Jun. 15, 2018) (“*Protective Order*”). Pursuant to discussions with Staff, custodial documents and data and materials being provided with this response, unless specifically reviewed and downgraded, have been classified as “Highly Confidential.” Notwithstanding that default classification, Applicants are not asserting Highly Confidential status for any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).



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the intervals requested. In such respects, the data set identified as “2018_12” is, in fact, a current snapshot of the carriers in use today, and may not be accurate in December.

- There are certain key performance indicators that T-Mobile tracks at the engineering market level, but not at the site or county level. T-Mobile has accordingly provided a separate worksheet for “Performance Data” for its engineering markets, rather than attempting to intermix the data with site-level data.
- Pursuant to discussions with the FCC’s Transaction Team, Deployed Carrier and Offered Capacity data are being provided at the site level, not at the county level. With respect to the Cost Data, T-Mobile has provided two tables, one at the county level (TMO_COMP_FCC_COST_DATA_SUBSCRIBER.csv), and one for subsidiary data that is not inherently linked to a geographic area (TMO_COMP_FCC_COST_DATA_FINANCE.xlsx). The latter table has all of the columns specified by the FCC’s format, but because most data elements are not reported out by those companies, most entries are zero or null values.
- Pursuant to discussions with the FCC’s Transaction Team, bouncing busy hour calculations have been performed using a seven day period, rather than the five weekdays specified in the *Data Request*.
- For the Service Plan data table, T-Mobile, pursuant to discussions with the FCC’s Transaction Team, has added three additional categories for “plan_type,” “Emp Paid Enterprise Mobile”; “Emp Paid Enterprise Mobile Broadband-Only”; and “Emp Paid Enterprise Other.”
- Within the service plan table, the *Data Request* specifies that intra-company plan changes be netted out—*i.e.*, activations and deactivations that are entirely within T-Mobile/MetroPCS be taken out. Because T-Mobile cannot net out intracompany activations and deactivations across its billing platforms, consistent with the direction of the FCC Transaction Team, T-Mobile has not netted out *any* activations and deactivations.
- Within the Service Plan table, “active_rev” and “deactive_rev” do not include “equipment_rev” as a component, consistent with T-Mobile’s internal tracking of revenue.
- Within the Customer Data table, “arpa” does not include “arpa_equipment” as one of its components, consistent with T-Mobile’s internal tracking of revenue.



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- Within the Customer Data and Porting Data tables, and with the consent of the FCC's Transaction Team, T-Mobile has defined enterprise customers as entities with 25 lines or more, rather than just 20.

The supplement to the document production contains materials that were originally classified as "privileged," but, upon further review, were determined not to be privileged.

Pursuant to the procedures set forth in the Protective Order, a copy of the filing is being provided to the Secretary's Office, including the USB drive and the hard drive.³ In addition, two copies of the Highly Confidential Filing are being delivered to Kathy Harris, Wireless Telecommunications Bureau, with a copy of the USB drive.⁴ A copy of the hard drive is also being sent, by overnight mail, to the FCC's e-Discovery vendor. Finally, a copy of the Redacted Highly Confidential Filing is being filed electronically through the Commission's Electronic Comment Filing System.⁵

Should any questions arise regarding this filing, please do not hesitate to contact the undersigned counsel for T-Mobile.

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

Enclosure

cc: Kathy Harris
Linda Ray
Kate Matraves
Jim Bird
David Krech

³ *Id.* at ¶13.

⁴ *Id.*

⁵ *Id.*

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