

WILLKIE FARR & GALLAGHER LLP

MICHAEL D. HURWITZ
202 303 1135
mhurwitz@willkie.com

1875 K Street, NW
Washington, DC 20006-1238
Tel: 202 303 1000
Fax: 202 303 2000

October 17, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20544

Re: *Applications of T-Mobile US, Inc. and Sprint Corporation, Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197*
REDACTED – FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Pursuant to the Commission’s October 3, 2018 letter (“Letter”),¹ Comcast Corporation (“Comcast”) hereby submits the redacted, public version of its responses to the Commission’s October 3, 2018 Information and Document Request (the “Request”).² The {{ }} symbols denote where Highly Confidential Information has been redacted. Pursuant to the terms of the Protective Order in this proceeding³ and instructions in the Letter, the Highly Confidential version of this filing has been submitted to the Office of the Secretary, with copies also submitted to Kathy Harris of the Wireless Telecommunications Bureau. The Highly Confidential version of this filing will be made available for inspection pursuant to the terms of the Protective Order.

Requests for the Highly Confidential version of this submission should be directed to Samuel Eckland of Willkie Farr & Gallagher ((202) 303-1214 or seckland@willkie.com).

¹ See Letter from Donald J. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathryn A. Zachem, Comcast Corporation, WT Docket No. 18-197 (Oct. 3, 2018).

² *Id.*

³ See *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 18-642 (June 15, 2018) (“Protective Order”).

REDACTED – FOR PUBLIC INSPECTION

Ms. Marlene H. Dortch
October 17, 2018
Page 2

Please contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,



Michael D. Hurwitz
Counsel for Comcast Corporation

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

Enclosures



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001
202.379.7121

October 17, 2018

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445 Twelfth Street, S.W.
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Re: *Applications of T-Mobile US, Inc. and Sprint Corporation, Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197*
REDACTED – FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Pursuant to the Commission’s October 3, 2018 letter (“Letter”),¹ Comcast Corporation (“Comcast”) hereby submits its responses to the Commission’s October 3, 2018 Information and Document Request (the “Request”).² The information and document submissions respond to the Request as clarified by discussions between Comcast representatives and Commission staff. Based on these discussions, Commission staff and Comcast agreed that the relevant time period for documents provided in response to the Request should be from July 2016 to July 2018. In response to Requests 1 and 4, documents are being provided to the Commission as agreed to by staff. Comcast expects to provide Responses to Requests 2 and 3 by October 22, 2018.

Comcast has made diligent efforts to ensure that none of the documents it is submitting herewith is privileged under the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or protection. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute waiver of any applicable privilege. Comcast requests that any privileged documents inadvertently produced be returned to

¹ See Letter from Donald J. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathryn A. Zachem, Comcast Corporation, WT Docket No. 18-197 (Oct. 3, 2018).

² *Id.*

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Ms. Marlene H. Dortch
October 17, 2018
Page 2

Comcast as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

If you have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Kathryn A. Zachem
Executive Vice President
Regulatory & State Legislative Affairs
Comcast Corporation

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

RESPONSES OF COMCAST CORPORATION TO THE
COMMISSION'S OCTOBER 3, 2018 INFORMATION AND DOCUMENT REQUEST

1. Provide documents sufficient to show the following:
 - a. the customers of the Company's mobile wireless service, including, but not limited to, the characteristics of customers and the mobile wireless service providers customers could have switched from previously;
 - b. the engineering of the Company's cable wireless networks, including, but not limited to, Wi-Fi handoffs with the Company's fixed network and the mobile wireless network the Company uses;
 - c. the revenues, costs, and profitability of the Company's wireless service;
 - d. any MVNO relationship the Company may have with a wireless company, including, but not limited to, the negotiations and financial terms of such MVNO contracts;
 - e. all plans to develop a facilities-based mobile wireless network or acquire spectrum or to use spectrum already acquired for mobile wireless service; and
 - f. any actual or potential impacts of other cable wireless service on the Company's business generally.

RESPONSE:

Documents and exhibits responsive to this Request have been provided to the FCC.

Comcast provides the following description of the accompanying Highly Confidential exhibits submitted in response to Requests 1 and 4:

Exhibit 16.1:

Information and data showing the total minutes of voice and bytes of data that Xfinity Mobile has used from April 2017 to August 2018 have been provided in machine-readable Excel spreadsheet format as Exhibit 16.1.

Exhibits 17.1 and 17.2:

For each county or county equivalent in which Comcast owns, licenses, or has an interest in spectrum, Exhibit 17.1 identifies the call sign, spectrum type, block, and amount in MHz. Comcast does not presently use the spectrum licenses to provide mobile wireless services.

Exhibit 17.2 provides information relating to various spectrum licenses used by Comcast in connection with its wireless testbed based in Philadelphia, Pennsylvania, including call sign, type, block, amount of spectrum, technology deployed, ownership status, and whether the spectrum is leased.

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Exhibits 18.1 through 18.4:

Information and data regarding Xfinity Mobile’s average total revenue per user per month, average data usage per user per month, and the number of total subscribers at the end of each month has been provided in machine-readable Excel spreadsheet format as Exhibits 18.1, 18.2, 18.3, and 18.4.

Exhibit 18.1 provides total revenue per month on a per-division/per-region basis. Exhibit 18.2 provides data usage per month on a per-division/per-region basis.

Comcast Cable’s regional operational structure is segmented into three core divisions (Northeast, Central, and West), each of which contains several regions. Exhibit 18.3 provides a table correlating Comcast’s divisions and regions to zip codes.

Exhibit 18.4 provides the total number of Xfinity Mobile accounts and lines per month on a per-zip code basis.

Exhibits 19.1 and 19.2:

Information and data showing the number of customers that ported away from and the number of customers that ported to Comcast Xfinity Mobile for each month for which data was readily available has been provided in machine-readable Excel spreadsheet format as Exhibits 19.1 and 19.2.

Exhibit 19.1 provides data on ports into Xfinity Mobile from each wireless carrier on a monthly basis. Data on ports in from landlines are not included. Exhibit 19.2 provides data on ports away from Xfinity Mobile on a monthly basis beginning in December 2017, based on the Operating Company Number (“OCN”) for the receiving carrier.

Exhibit 20:

Information and data showing the percentage of network traffic that is hosted by Comcast’s network infrastructure for each technology (i.e., public hotspot, home hotspot, etc.) and the percentage of traffic hosted by a mobile network operator has been provided in machine-readable Excel spreadsheet format as Exhibit 20.

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- 4. Provide all documents provided to any state or federal entity for purposes of reviewing the Proposed Transaction that relate to the items in Specifications 1(a)-(f).**

RESPONSE:

Documents responsive to this Request have been provided to the FCC.