



REDACTED – FOR PUBLIC INSPECTION

cnorthrop@telecomlawpros.com
202.789.3113

October 18, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Applications of T-Mobile US, Inc., and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations (WT Docket No. 18-197); General Information and Document Request for Cellular South

Dear Ms. Dortch:

Cellular South, Inc. d/b/a C Spire (“C Spire”) hereby responds to the letter and Request for Information dated October 4, 2018 (“Information Request”), from Donald K. Stockdale, Jr., Chief of the Wireless Telecommunications Bureau of the Federal Communications Commission (the “Commission” or “FCC”) in connection with the Commission’s review of the proposed merger of T-Mobile US, Inc., and Sprint Corporation. Pursuant to the Protective Order in this proceeding and the instructions set forth in the Information Request, enclosed is one password-protected flash drive containing a copy of Highly Confidential documents responsive to Specifications #1 and #2 of the Information Request.¹

This filing contains information that is “Highly Confidential” pursuant to the Protective Order in WT Docket No. 18-197. Accordingly, pursuant to the procedures set forth in the Information Request and Protective Order, a copy of the Highly Confidential filing is being provided to the Secretary’s Office. In addition and pursuant to the direction of FCC Staff, one copy of the Highly Confidential production is being delivered to the FCC’s e-Discovery vendor. Finally, a public version of this Highly Confidential filing is being labeled as “Public – Redacted” and being filed electronically through the Commission’s Electronic Comment Filing System in the above-referenced docket.

C Spire has made a good faith effort to assemble relevant probative documents responsive to this inquiry. C Spire has also made a good faith effort to ensure that none of the documents being submitted herewith are privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute waiver of any applicable privilege.

¹ Pursuant to discussions with FCC Staff, C Spire has been instructed to only respond to Specifications #1 and #2.



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Should any questions arise with respect to this Response, please contact the undersigned counsel.

Sincerely,

Carl W. Northrop
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc: Jackie Joyner, Complete Discovery Source

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In re Applications of)
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T-Mobile US, Inc. and Sprint Corporation) WT Docket No. 18-197
for Consent to Transfer Control of Licenses)
and Authorizations)
)
General Information and Document Request)
for Cellular South)
)

**RESPONSE OF CELLULAR SOUTH, INC. D/B/A C SPIRE TO GENERAL
INFORMATION AND DOCUMENT REQUEST**

Cellular South, Inc. d/b/a C Spire (“C Spire”) provides this response to the letter and Request for Information dated October 4, 2018 (“Information Request”), from Donald K. Stockdale, Jr., Chief of the Wireless Telecommunications Bureau of the Federal Communications Commission (the “Commission” or “FCC”) in connection with the Commission’s review of the proposed merger of T-Mobile US, Inc., and Sprint Corporation. Pursuant to discussions with FCC Staff, C Spire has be instructed to only respond to Specifications # 1 and # 2, which seek responsive documents and data.

1. ***Provide all plans, analyses, and reports that relate to or discuss:***
 - a. ***The potential effect of the Proposed Transaction on the Company’s core wireless business, wireless data business, and any potential business plans, including, but not limited to, fixed wireless and video;***
 - b. ***The competitive positioning of the Company and other mobile wireless service providers (e.g., price and quality relative to others) for any Relevant Service or any Relevant Product in any Relevant Area (including any surveys conducted by the Company or any third party);***
 - c. ***How consumers or enterprise customers or competitors view and value mobile wireless services or products offered by the Company or by other***

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mobile wireless service providers for any Relevant Service or any Relevant Product in any Relevant Area (including any surveys conducted by the Company or any third party); and

- d. Spectrum utilization and efficiency, any spectrum capacity constraints the Company is currently facing or is projected to face in the future, and the amount and band of spectrum needed for the Company to provide mobile wireless services for each technology currently deployed or that will be deployed in the Company's network, including the Company's 5G plans.*

Documents responsive to Specification #1 are in the Document Production ranging from FCC – CS 004898 to FCC – CS 006927.

- 2. 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)-(d).*

Documents responsive to Specification #2 are in the Document Production ranging from FCC – CS 000001 to FCC – CS 004897.