



October 24, 2018

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VIA ECFS

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

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; General Information and Document Request for TracFone Wireless

Dear Ms. Dortch:

On behalf of TracFone Wireless (“TracFone”), pursuant to the Protective Order adopted in this proceeding¹ and the phone conversation among the undersigned, Anthony Petruzzi, Charles Mathias, and Joel Rabinovitz on November 17, 2018, TracFone with this letter produces a flash drive containing an initial production of unredacted documents marked with the legend “Highly Confidential.” The documents are responsive to the General Information and Document Request dated October 3, 2018 (the “Document Request”). An additional, identical flash drive is being hand delivered to Kathy Harris of the Wireless Telecommunications Bureau, and a third is being sent via overnight mail to Complete Discovery Source, 250 Park Ave, 18th Floor, New York, NY 10177. This letter memorializes some of the logistical and scope issues we have agreed to.

TracFone is producing documents on a rolling basis and will supplement this production as necessary. The production is being treated as Highly Confidential and no documents (other than this cover letter and any cover letter accompanying any subsequent production) will be uploaded into ECFS. All documents will be marked appropriately per our discussion and correspondence.

As discussed, TracFone’s production largely contains documents dating from 2016. In addition, a subset of the documents does not contain all of the metadata identified in the Document Request, due to the nature of some documents and how they were initially collected.

¹ *In re Applications of T-Mobile US, Inc. and Sprint Corporation, Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations*, Protective Order, WT Dkt. No. 18-197, DA 18-624 (rel. June 15, 2018).

Marlene H.
Dortch, Secretary
October 24, 2018
Page 2

As agreed in our October 17 phone conversation, TracFone's production includes non-sequential bates numbers.

With respect to FCC Request Number 2, TracFone is not producing a separate .csv file at this time because the information requested can be found elsewhere in the production.

With respect to FCC Request Number 3, some documents that were responsive to other requests are not responsive to FCC Request Number 1 and will not be included in this production to the FCC. A list of the bates numbers associated with those documents is included in this production.

Should there be any questions concerning this matter, please contact the undersigned.

Respectfully Submitted,

/s/ Megan L. Brown

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Counsel to TracFone Wireless

Attachment

cc: Kathy Harris
Federal Communications Commission, Wireless Telecommunications Bureau
445 12th Street, S.W.
Room 2-B550
Washington, DC 20554

Complete Discovery Source
Attn: Jackie Joyner
250 Park Ave.
18th Floor
New York, NY 10177

REDACTED – FOR PUBLIC INSPECTION

Documents produced have been redacted in their entirety as Highly Confidential Information.