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March 11, 2019
VIA ECFS

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

REDACTED – FOR PUBLIC INSPECTION

**Re: Notification of Written *Ex Parte* Presentation
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:

Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), notice is hereby provided of a written *ex parte* presentation in the above-referenced docket. By this filing, T-Mobile US, Inc. ("T-Mobile") hereby responds to suggestions by the Rural Wireless Association ("RWA") and Cellular South, Inc. d/b/a C-Spire ("C-Spire") that T-Mobile lacks sufficient backhaul capacity in rural areas to support T-Mobile's current represented coverage and speeds as well as New T-Mobile's 5G plans.¹ Contrary to these assertions, T-Mobile presently has substantial high-speed backhaul capabilities for its rural facilities, and has concrete plans in place to further increase bandwidth to meet the performance requirements of the New T-Mobile network.

As of January 2019, [REDACTED] of T-Mobile's rural sites have high speed backhaul. The remaining [REDACTED] of rural sites use temporary circuits and satellite connections to transport backhaul, while awaiting contracted fiber build-out.² Among those rural sites with high-speed backhaul, [REDACTED] use fiber backhaul and [REDACTED] currently use high speed microwave backhaul with upgrades beginning in 2019 to multi-gigabit links. Further, [REDACTED] of the sites

¹ Rural Wireless Association, Notice of *Ex Parte*, WT Docket No. 18-197 at 2 (Dec. 10, 2018) ("RWA *Ex Parte*"); Cellular South, Inc. d/b/a C-Spire, Notice of *Ex Parte* Communication, WT Docket No. 18-197 at 4 (Nov. 8, 2018).

² As such, RWA is plainly wrong in claiming that T-Mobile uses satellite connections and temporary circuits "in many areas". RWA *Ex Parte* at 2.



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currently using microwave backhaul are also awaiting contracted fiber build-out. In summary, [REDACTED] of T-Mobile's rural sites deliver [REDACTED] today.

Additionally, T-Mobile has future-proofed its backhaul to handle the performance requirements of New T-Mobile with scalable/upgradable solutions and contractual arrangements already in place. Once those upgrades are completed, [REDACTED] of T-Mobile's rural sites will support 5G and LTE bandwidth reaching [REDACTED] and [REDACTED] of its rural sites will support 5G and LTE bandwidth reaching up to [REDACTED]. T-Mobile continues to work with vendors upgrading backhaul at its remaining sites, but these sites will have sufficient bandwidth in the near term.

As such, RWA's and C-Spire's statements that backhaul is a "problem" for T-Mobile and New T-Mobile in rural areas are without basis.

Please direct any questions regarding the foregoing to the undersigned.

Respectfully submitted,

DLA Piper LLP (US)

/s/ Nancy J. Victory

Nancy J. Victory
Partner

NV

cc: David Lawrence
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