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 a 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

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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.
current using microwave backhaul are also awaiting contracted fiber build-out. In summary, ______ of T-Mobile’s rural sites deliver _______ 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, ______ of T-Mobile’s rural sites will support 5G and LTE bandwidth reaching ______ and ______ of its rural sites will support 5G and LTE bandwidth reaching up to ______. 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
    Kathy Harris
    Linda Ray
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