



[REDACTED – FOR PUBLIC INSPECTION]

April 1, 2019

**VIA ECFS**

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

**RE: WT Docket No. 18-197: *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations***

Dear Ms. Dortch,

Pursuant to the Protective Order (DA 18-624) issued in this docket, please find attached a redacted copy for public inspection of an *ex parte* by the Rural Wireless Association (“RWA”).

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Caressa D. Bennet  
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David Krech



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March 28, 2019

**VIA ECFS**

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

**RE: NOTICE OF EX PARTE**  
**WT Docket No. 18-197: Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations**

Dear Ms. Dortch,

The Rural Wireless Association (“RWA”) files this *ex parte* in response to a Highly Confidential filing submitted by T-Mobile.<sup>1</sup> Throughout the *Backhaul Ex Parte*, T-Mobile makes claims that are highly speculative, contradicted by drive test evidence, and/or misleading in nature. T-Mobile has provided no verifiable evidence of its delivery of high-speed backhaul to rural cell sites.

In December 2017, RWA filed both an *ex parte*<sup>2</sup> and an informal request for Commission action<sup>3</sup> which directed the Commission’s attention to T-Mobile’s claims that the nationwide carrier was providing 4G LTE coverage to various rural markets, and that this alleged T-Mobile 4G LTE coverage was supported by high-speed backhaul from cell sites located in these rural markets. In several declarations supporting the *RWA Informal Request*, RWA members provided the Commission with exhaustive drive-test results and photographic evidence

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<sup>1</sup> T-Mobile Ex Parte Regarding High Speed Backhaul (filed March 11, 2019) (“*Backhaul Ex Parte*”).

<sup>2</sup> RWA Ex Parte, WT Docket Nos. 10-208, 18-197 (filed December 10, 2018) (“*RWA December 10 Ex Parte*”);

<sup>3</sup> *In the Matter of Connect America Fund, Universal Service Reform – Mobility Fund, RWA Informal Request for Commission Action*, WT Docket Nos. 10-208, 18-197 (filed December 26, 2018) (“*RWA Informal Request*”)

that unquestionably disprove the existence of fiber connectivity or microwave backhaul, or the existence of satellite backhaul facilities capable of supporting 5 Mbps download speeds.<sup>4</sup>

In its *Backhaul Ex Parte*, T-Mobile asserts without support that [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED] [END HIGHLY CONFIDENTIAL INFORMATION] of the company's existing *rural* cell sites have "high speed backhaul." The company goes on to say that [BEGIN HCI] [REDACTED] [END HCI] of its rural sites deliver an average bandwidth of [BEGIN HCI] [REDACTED] [END HCI]. Finally, T-Mobile states that it has "future-proofed" its backhaul capabilities and that "[o]nce those upgrades are completed," at least [BEGIN HCI] [REDACTED] [END HCI] of T-Mobile's rural cell sites will support bandwidth reaching [BEGIN HCI] [REDACTED] [END HCI]. T-Mobile provides the Commission with absolutely no documentation confirming just how many of its rural cell sites have fiber or sufficient microwave backhaul capabilities instead of the slower "temporary circuits" or "satellite connections" to transport backhaul. Additionally, T-Mobile fails to explain what qualifies as a rural cell site. In short, none of T-Mobile's claims and promises in its *Backhaul Ex Parte* are even remotely verifiable, and accordingly, they should be given little to no weight by the Commission.<sup>5</sup>

RWA's members have already demonstrated that a significant subset of T-Mobile's rural cell sites -- in disparate rural markets in three states -- are serviced by substandard backhaul, and are thus not capable of the download speeds T-Mobile is touting. T-Mobile's failure to deploy high-speed backhaul facilities when and where it says it has in the recent past is indicative of its inability to keep its promises to provide sufficient backhaul in rural areas in the future.

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<sup>4</sup> See Declaration of Lynn Merrill ("Merrill Declaration"); Declaration of Mike Kilgore ("Kilgore Declaration"); Declaration of Jerry Tilley ("Tilley Declaration"); Declaration of Remi Sun ("Sun Declaration"); Declaration of Jana Wallace ("Wallace Declaration"); and Declaration of John Nettles ("Nettles Declaration") (filed December 26, 2018).

<sup>5</sup> See also Cellular South, Inc. d/b/a C Spire Ex Parte, WT Docket No. 18-197, filed March 27, 2019 (noting that T-Mobile's "nebulous claims do not demonstrate that New T-Mobile will actually obtain the backhaul necessary to construct new sites in rural areas unserved by T-Mobile").

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Accordingly, the Commission should not blindly assume that T-Mobile will be able to provide the claimed backhaul speeds of [BEGIN HCI] [REDACTED] [END HCI] in the near future. Indeed, T-Mobile does not even provide a timeline for when any remaining non-fiber or non-microwave rural cell sites will be upgraded.

Respectfully submitted,

/s/ Caressa D. Bennet

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