



OFFICE OF THE ARIZONA ATTORNEY GENERAL

MARK BRNOVICH
ATTORNEY GENERAL

CIVIL LITIGATION DIVISION
ANTITRUST UNIT

June 5, 2019

Donald Stockdale, Chief
Wireless Telecommunications Bureau
Kathy Harris
Mobility Division, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WT Docket No. 18-197, Confidentiality of NRUF/LNP Data

Dear Mr. Stockdale and Ms. Harris:

The Arizona Office of the Attorney General (the "Attorney General") is analyzing the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. and whether that acquisition would violate any federal or Arizona laws. In connection with this, the Attorney General is seeking access to documents and information that contain Numbering Resource Utilization Forecast ("NRUF") data and local number portability ("LNP") data pursuant to its authority under Arizona Revised Statutes ("A.R.S.") § 44-1406.

A.R.S. § 44-1406(E) provides that testimony taken or material produced to the Attorney General under A.R.S. § 44-1406 shall be kept confidential by the Attorney General unless and until the Attorney General brings an action for violation of the State Antitrust Act, A.R.S. § 44-1401, *et seq.*, with the following exceptions: (i) confidentiality is waived by the person whose testimony is disclosed; (ii) confidentiality is waived by the person who produced to the Attorney General the material being disclosed; (iii) documents or information are disclosed solely to the person who provided the documents or information; or (iv) disclosure is authorized by court order. A.R.S. § 44-1406(E). Additionally, A.R.S. § 44-1406(F) provides that the Attorney General may disclose the testimony or material to the United States or any other state, if before such disclosure, the receiving official agrees in writing to comply with the confidentiality restrictions of § 44-1406. If any of the documents or information received pursuant to A.R.S. § 44-1406 should become the subject of a discovery request or public records request by a third party, the Attorney General shall assert all privileges, exemptions from, or other objections to disclosure in response to such request that the Attorney General in good faith deems appropriate under applicable law.

If you have any questions or concerns please feel free to call me at (602) 542-7748.

Sincerely,

Dana Vogel
Antitrust Unit Chief