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September 19, 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 Delaware Department of Justice is conducting an inquiry into whether the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. would violate any federal or Delaware laws. In connection with that investigation, the Delaware Department of Justice plans to seek access to materials filed with the Federal Communications Commission ("FCC") that contain or incorporate Numbering Resource Utilization and Forecast ("NRUF") data and local number portability ("LNP") data provided by telecommunications carriers. This letter sets forth the confidentiality protections that the Delaware Department of Justice will accord to NRUF and LNP data and any filings containing such data that are obtained in connection with its investigation of the proposed transaction.

The Delaware Department of Justice will use NRUF and LNP data, and any materials containing such data, only for legitimate law enforcement purposes and will keep such data confidential under the authority provided to the Delaware Department of Justice under 29 *Del. C.* § 10002(g)(3). The Delaware Department of Justice will not disclose such data unless such disclosure is required by law or is reasonably required to further a legitimate law enforcement purpose. Should the Delaware Department of Justice disclose any NRUF/LNP data, or confidential information that is based on that data, in a court filing or otherwise, the Delaware Department of Justice will notify the affected parties as soon as is reasonably practicable, seek to file such information under seal, and make reasonable efforts to limit the disclosure of the information until the affected parties have had an opportunity to appear before the court and the court has ruled on any request by the affected party or parties.

Furthermore, if a request is made under Delaware Freedom of Information Act, 29 Del. C. §§ 10001, *et seq.*, for the disclosure of NRUF/LNP data, or information based on such data, the Delaware Department of Justice will assert any exemptions it deems applicable and use its best efforts to provide concerned parties with notice prior to the release of any such data or information. If NRUF data, LNP data, and/or confidential information based on that data become the subject of discovery in any litigation to which the State of Delaware or any unit thereof is a party, the Delaware Department of Justice will use its best efforts to ensure that a protective order is entered and will make reasonable efforts to avoid providing the requested data or information until all concerned parties have had an opportunity to review and comment on the protective order and to apply to the court for further protection.

Please do not hesitate to contact me if you have any questions about this matter or need further information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael A. Undorf", with a long horizontal line extending to the right.

Michael A. Undorf
Deputy Attorney General