



STATE OF ALABAMA
OFFICE OF THE ATTORNEY GENERAL

STEVEN T. MARSHALL
ATTORNEY GENERAL

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September 7, 2018

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 Attorney General of the State of Alabama ("Attorney General") is conducting an inquiry into the proposed acquisition of Sprint Corporation by T-Mobile US, Inc.

The Attorney General is seeking access to the documents and information that contain Numbering Resource Utilization and Forecast ("NRUF") data and Local Number Portability ("LNP") data that the parties to the proposed acquisition produced or to be furnished to the Federal Communications Commission ("Commission"). The Attorney General understands that the documentary evidence submitted to the Commission includes confidential information subject to a protective order and other protections.

The Attorney General shall not divulge any documents or information it receives except in connection with a legitimate law enforcement purpose or a judicial proceeding.

The Attorney General will protect the confidentiality of the documents and information to the fullest extent applicable and protect the confidentiality of the documents and information pursuant to Alabama law, including ALA. CODE § 12-21-3.1.

If you have any questions, please feel free to call me.

Sincerely,

A handwritten signature in black ink that reads "Billington M. Garrett".

Billington M. Garrett
Assistant Attorney General

BMG/msc

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Attorney General



ATTORNEY GENERAL
KARL A. RACINE

Public Advocacy Division
Public Integrity Section

September 7, 2018

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

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

Dear Mr. Stockdale and Ms. Harris:

The Office of the Attorney General for the District of Columbia (“OAG”) is conducting an inquiry into whether the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. would violate any federal and/or District of Columbia laws. In connection with this investigation, the Attorney General is seeking access to documents and information that contain Number Resource Utilization and Forecast (“NRUF”) data and local number portability (“LNP”) data. This letter sets forth the confidentiality provisions this Office will provide the data pursuant to District law.

The OAG will keep all NRUF and LNP data, and any materials containing such data, only for legitimate law enforcement purposes and will keep such data confidential pursuant to D.C. Code § 28-4505(k). The OAG will not disclose data it receives pursuant to §24-4505(k) unless disclosure is required by law or reasonably required to further legitimate law enforcement purposes. Additionally, if any documents or information this Office receives pursuant to §28-4505(k) should become the subject of a discovery request or public records request by a third party, the OAG will 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 contact me at (202) 442-9864 or catherine.jackson@dc.gov.

Donald Stockdale
Kathy Harris
September 7, 2018
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Sincerely,

KARL A. RACINE
Attorney General for the District of Columbia

By: 
CATHERINE JACKSON
Chief, Public Integrity Section



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

800 Fifth Avenue, Suite 2000 • Seattle, Washington 98104-3188

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September 7, 2018

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

Dear Mr. Stockdale and Ms. Harris:

Washington State is investigating the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. to determine whether it violates federal or Washington state antitrust law. For purposes of that investigation, and pursuant to its subpoena powers under RCW 19.86 *et seq.*, Washington is seeking access to information contained in the Numbering Resource Utilization and Forecast (NRUF) reports filed by wireless telecommunications carriers and to disaggregated, carrier-specific local number portability (LNP) data related to wireless telecommunications carriers.

Washington State will not divulge any documents or information it receives pursuant to RCW 19.86, except in connection with a legitimate law enforcement purpose or a judicial proceeding. If a request is made under the Washington State Public Records Act for the disclosure of confidential information, Washington will assert all applicable exemptions that the Attorney General in good faith deems appropriate under applicable law. Please do not hesitate to contact me if you have any questions about this matter or need further information.

Sincerely,

Neal H. Luna
Assistant Attorney General
(206) 326-5481
neall@atg.wa.gov

cc (via email): Paula L. Blizzard, Deputy Attorney General, CA Department of Justice

GEORGE JEPSEN
ATTORNEY GENERAL



55 Elm Street
P.O. Box 120
Hartford, CT 06141-0120

Office of the Attorney General
State of Connecticut
August 31, 2018

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

Dear Mr. Stockdale and Ms. Harris:

The Office of the Connecticut Attorney General ("CTAG") is conducting an inquiry into whether the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. would violate any federal and/or Connecticut state laws. In connection with this investigation, CTAG is seeking access to documents and information containing Numbering Resource Utilization and Forecast ("NRUF") data and local number portability ("LNP") data under the provisions of Conn. Gen. Stat. §35-42.

Pursuant to Conn. Gen. Stat. §§35-42(c)(1), (c)(2) and (e), as well as the holding of the Connecticut Supreme Court in Brown & Brown v. Blumenthal, 297 Conn. 710 (Conn. 2010), any such information will be held in confidence by CTAG and shall not be disclosed outside CTAG except to officials of other states and the federal government. If any documents or information received shall become the subject of a discovery request or public records request by a third party, CTAG shall assert all privileges, exemptions from and other objections to disclosure in response to such request that CTAG in good faith deems appropriate under applicable law.

If you should have any questions or concerns, please do not hesitate to contact me at (860) 808-5169

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gary M. Becker".

Gary M. Becker
Assistant Attorney General

DAVID Y. IGE
GOVERNOR



RUSSELL A. SUZUKI
ATTORNEY GENERAL

DANA O. VIOLA
FIRST DEPUTY ATTORNEY GENERAL

STATE OF HAWAII
DEPARTMENT OF THE ATTORNEY GENERAL
COMMERCE AND ECONOMIC DEVELOPMENT DIVISION
425 QUEEN STREET
HONOLULU, HAWAII 96813
(808) 586-1180

September 5, 2018

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 Attorney General of the State of Hawaii (the "Attorney General") is conducting an inquiry into whether the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. would violate any federal and/or Hawaii state laws.

The Attorney General has requested the parties to the proposed acquisition and others to produce documentary evidence furnished or to be furnished to the Federal Communications Commission ("Commission"). We understand that the documentary evidence submitted to the Commission includes confidential information subject to a protective order and other protections.

At the outset, we provide assurance to the Commission that all documentary evidence sought by the Attorney General will be used for legitimate law enforcement purposes associated with the review of the proposed acquisition.

While the documentary evidence is in the possession of the Department of the Attorney General ("Department"), the evidence will not be available for examination by third parties without the consent of the person who produced the evidence, nor even examined by a representative of the Department who is not duly authorized to do so.

Additionally, in the event a person seeks access to the documentary evidence pursuant to the open records law (Uniform Information Practices Act (Modified), Haw. Rev Stat. Chapter 92F), we would treat the evidence as exempt from public disclosure to avoid the frustration of a

Donald Stockdale
Kathy Harris
September 5, 2018
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legitimate government function given our understanding that the evidence would not otherwise be available to the Department without the confidentiality assurance.

We also note that the open records law also protects documentary evidence from disclosure where the evidence is protected from disclosure by federal law.

In the event of an open records request, the Department will notify the producing party of such a request, and assert all privileges, exemptions, and objections to disclosure that in good faith may be asserted.

Upon the completion of the investigation and any case or proceeding arising from the investigation, the Department will return the documentary evidence to the producing party which has not passed into the control of any court or grand jury as a part of the record of the case or proceeding.

Should you have any questions, please contact the undersigned immediately.

Very truly yours,



Rodney I. Kimura
Deputy Attorney General

STATE OF MISSISSIPPI



JIM HOOD
ATTORNEY GENERAL

September 6, 2018

Via Mail

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 Data Request and Confidentiality of NRUF / LNP Data

Dear Mr. Stockdale and Ms. Harris,

The Mississippi Attorney General's Office ("Attorney General") seeks access to Numbering Resource Utilization and Forecast Reports ("NRUF") data related to WT Docket No. 18-197. This letter sets forth the relevant confidentiality provisions for such data pursuant to Mississippi law.

The Attorney General will keep all NRUF data, and any materials containing such data, only for legitimate law enforcement purposes and will keep such data confidential to the fullest extent possible under all applicable laws including, but not limited to, Mississippi Code Ann. §§25-61-3 and 25-61-9. The Attorney General will not disclose such data unless the disclosure is required by law or reasonably required to further the legitimate law enforcement purposes or as part of a judicial proceeding.

Additionally, if any documents or information should become the subject of a discovery request or public records request by a third party, the Attorney General shall assert all applicable privileges, exemptions, or other objections to disclosure in response to such request that the Attorney General in good faith deems appropriate under applicable law, and the Attorney General will follow the notice provisions as set forth in Mississippi Code Ann. § 25-61-9.

If you have any questions or concerns, please feel free to call me at (601) 359 4213.

Kindest Regards,

A handwritten signature in cursive script, appearing to read "Crystal Utley Secoy".

Crystal Utley Secoy
Special Assistant Attorney General



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring
Attorney General

202 North Ninth Street
Richmond, Virginia 23219
804-786-2071
Fax 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

September 6, 2018

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 Attorney General of Virginia (the "Attorney General") is conducting an inquiry into whether the proposed acquisition of Sprint Corporation by T-Mobile US, Inc. would violate any federal or Virginia laws. In connection with this investigation, the Attorney General is seeking access to documents and information that contain Numbering Resource Utilization and Forecast ("NRUF") data and local number portability ("LNP") data pursuant to its civil investigative demand power under Virginia Code § 59.1-9.10.

The Attorney General shall not divulge any documents or information it receives pursuant to § 59.1-9.10 except in connection with a legitimate law enforcement purpose or a judicial proceeding. *See* § 59.1-9.10(N). Additionally, if any documents or information received pursuant to § 59.1-9.10 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 (804) 692-2045.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tyler T. Henry".

TYLER T. HENRY
Assistant Attorney General

For MARK R. HERRING
Attorney General