



DLA Piper LLP (US)
500 Eighth Street, NW
Washington, DC 20004
www.dlapiper.com

Nancy J. Victory
nancy.victory@dlapiper.com
T (202) 799-4216

November 9, 2018

By ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

REDACTED – FOR PUBLIC INSPECTION

Re: 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:

T-Mobile US, Inc. (“T-Mobile”) hereby submits a supplement in response to the FCC’s August 15, 2018, General Information and Document Request from the Federal Communications Commission (the “Commission”) in the above-referenced docket.¹ This supplemental filing includes: (i) revised privilege logs, correcting the logs provided on November 6, 2018;² (ii) an “FCC Annex A.xlsx” listing items that, upon review, have been determined to have been inadvertently produced privileged material, which should therefore be deleted; (iii) a supplemental document production that includes privilege downgrades; (iv) a production overlay that includes certain “.txt” files that did not appear to copy correctly for the FCC-TMUS-PROD001-001 production set; (v) a production overlay that addresses the FCC Annex A clawbacks in the production set; (vi) an updated site list that eliminates sites with zero traffic; (vii) a revised retail store listing; (viii) a rollup of customer data into an “Any Mobile Device” category; and (ix) a map depicting T-Mobile’s engineering markets.

The supplement consists of two DVDs, one containing the load files, production index, and production materials associated with the document production changes, with items tagged as “Highly Confidential,” “Confidential,” and “Public,” per the Protective Order³ (the “Production

¹ Letter from Donald K. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathleen O’Brien Ham, T-Mobile U.S., Inc., WT Docket No. 18-197 (Aug. 15, 2018) (“*Information Request*”).

² The November 6 logs used incorrect Bates numbering for the FCC production.

³ *In the Matter of Applications of T-Mobile US, Inc. and Sprint Corporation Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations*, Protective Order, WT Docket No. 18-197, DA 18-624 (Jun. 15, 2018) (“*Protective Order*”). Pursuant to discussions with Staff, custodial documents and data and materials being provided with this response, unless specifically reviewed and downgraded, have been classified as “Highly Confidential.” Notwithstanding that default classification, Applicants are not asserting Highly Confidential status for



Marlene H. Dortch, Secretary
November 9, 2018
Page Two

DVD”); and one containing the Highly Confidential revised economic and engineering tables (the “Data DVD”). Pursuant to the procedures set forth in the Protective Order, a copy of the filing is being provided to the Secretary’s Office, including both DVDs.⁴ In addition, two copies of the Highly Confidential Filing are being delivered to Kathy Harris, Wireless Telecommunications Bureau, with a copy of the Data DVD.⁵ A copy of the Production DVD information is also being provided to the FCC’s e-Discovery vendor. Finally, a copy of the Redacted Highly Confidential Filing is being filed electronically through the Commission’s Electronic Comment Filing System.⁶

Finally, a copy of the Redacted Highly Confidential Filing is being filed electronically through the Commission’s Electronic Comment Filing System.⁷

Respectfully submitted,

/s/ Nancy J. Victory

Nancy J. Victory

Enclosure

cc: Kathy Harris
Linda Ray
Kate Matraves
Jim Bird
David Krech

any documents that have been publicly released (which would be Public) or for third party materials that are copyrighted (which would be considered Confidential).

⁴ *Id.* at ¶13.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

REDACTED