

HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR
GREGORY W. WHITEAKER
ROBIN E. TUTTLE[†]
SUSAN C. GOLDHAR ORNSTEIN
SARAH L. J. ACEVES^{††}

[†]Admitted in DC, SC and FL only
^{††}Admitted in DC only

TEL 202-600-7272
FAX 202-706-6056
3204 TOWER OAKS BLVD, STE 180
ROCKVILLE, MD 20852

REDACTED – FOR PUBLIC INSPECTION

October 6, 2014

VIA ECFS

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

Re: Applications of AT&T Inc., Plateau Telecommunications, Inc., E.N.M.R.
Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas
RSA 3 Limited Partnership for Consent To Assign Licenses and Authorizations
(WT Docket No. 14-144)

Dear Ms. Dortch:

On behalf of Plateau Telecommunications, Inc., E.N.M.R. Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas RSA 3 Limited Partnership (collectively “Plateau Wireless”), attached is the public version of the response (“Response”) to the Wireless Telecommunications Bureau (“WTB”) General Information Request dated September 22, 2014 (“Request”). Pursuant to the Request and the Joint Protective Order in this proceeding, this public version of the Response has been redacted for public inspection. The unredacted confidential version of the Response is being delivered today to your office under separate cover and, to the Wireless Telecommunications Bureau.

Please direct any questions regarding this Response to the undersigned.

Respectfully submitted,



Gregory W. Whiteaker
Counsel for Plateau Wireless

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
October 6, 2014
Page 2 of 2

Enclosure

cc (via email): Kathy Harris
Scott Patrick
Linda Ray
Kate Matraves
Jim Bird
TransactionTeam@fcc.gov

HERMAN & WHITEAKER, LLC

DONALD L. HERMAN, JR
GREGORY W. WHITEAKER
ROBIN E. TUTTLE[†]
SUSAN C. GOLDHAR ORNSTEIN
SARAH L. J. ACEVES^{††}

[†]Admitted in DC, SC and FL only

^{††}Admitted in DC only

TEL 202-600-7272

FAX 202-706-6056

3204 TOWER OAKS BLVD, STE 180

ROCKVILLE, MD 20852

REDACTED – FOR PUBLIC INSPECTION

October 6, 2014

VIA HAND DELIVERY

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

RE: Applications of AT&T Inc., Plateau Telecommunications, Inc., E.N.M.R.
Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas
RSA 3 Limited Partnership for Consent To Assign Licenses and Authorizations
(WT Docket No. 14-144)

Dear Ms. Dortch:

Plateau Telecommunications, Inc., E.N.M.R. Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas RSA 3 Limited Partnership (collectively “Plateau Wireless”) hereby respond (the “Response”) to the Wireless Telecommunications Bureau (“WTB”) General Information Request dated September 22, 2014 (“Request”).¹ The Request seeks information or documents to assist the Federal Communications Commission (“FCC” or “Commission”) to complete its review of the applications in the above-referenced proceeding.

The Request calls for Plateau Wireless to submit certain information and documents that are sensitive from a commercial, competitive, and financial perspective, and that Plateau Wireless would not reveal in the ordinary course of business to the public or its competitors. Plateau Wireless is submitting information and documents on a Highly Confidential basis pursuant to the Joint Protective Order issued on September 22, 2014. The inadvertent inclusion of any material that is subject to an assertion of the attorney-client, attorney work-product, or

¹ Letter from Roger C. Sherman, Chief, Wireless Telecommunications Bureau, to Launa Waller, Plateau Telecommunications, Inc., WT Docket No. 14-144 (Sept. 22, 2014) and accompanying General Information Request.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
October 6, 2014
Page 2 of 6

other applicable privilege is not intended as a waiver of such privilege. Plateau Wireless requests that any privileged documents inadvertently produced be returned to Plateau Wireless as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

In the public version of the Response, Plateau Wireless has redacted Highly Confidential Information and marked the redactions with “[BEGIN PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION] . . . [END PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION]”. The redacted Response is marked “REDACTED – FOR PUBLIC INSPECTION” and is being filed electronically in the Commission’s Electronic Comment Filing System (“ECFS”). The Highly Confidential, unredacted Response is marked, “HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDERS IN WT DOCKET NO. 14-144 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION” and is being delivered to the Secretary. Additional copies of the unredacted Response are being delivered as instructed in the Request.

Exhibits responsive to specific requests are numbered with reference to the specific request (*e.g.*, Exhibit 2.a.1 responds to Request 2(a)). A list of all exhibits is provided as Exhibit A. ESRI shapefiles provided in native format specifically directed by the Request are not sequentially numbered.

RESPONSES

Request:

1. Explain in detail the decision made by Plateau Wireless to assign the spectrum, customers and network assets that are the subject of this application to AT&T, including any attempts made to enter into a sale of this wireless business or alternative arrangements with parties other than AT&T.

Response:

Because of reductions in roaming revenue and wireless Universal Service Fund (“USF”) support, Plateau Wireless [BEGIN PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION]

Marlene H. Dortch, Secretary
October 6, 2014
Page 3 of 6

[END

PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION]

Request:

2. On page 5 of the Public Interest Statement, the Applicants claim that “AT&T plans to complete Plateau Wireless’s 4G HSPA+ deployment and to overlay LTE technology, both at a much faster pace than Plateau Wireless would be able to achieve.” For each Relevant Area, provide:
 - a. A detailed discussion of the Company’s current and planned (pre-transaction) deployment of HSPA+ and LTE, which identifies the spectrum bands and the total amount of spectrum currently deployed and planned for future deployment for HSPA+ and LTE.
 - b. Identify the number and percentage of Plateau Wireless’s subscriber devices that are GSM, HSPA, HSPA+ and/or LTE capable.
 - c. Provide all documents relied on in preparing the responses for 2(a) – 2(b).

Response to 2(a):

4G HSPA+

Plateau Wireless began upgrading its 2G GSM network to 4G HSPA+ in 2012, **[BEGIN PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION]**

[END PLATEAU

WIRELESS HIGHLY CONFIDENTIAL INFORMATION] Typically, all sites budgeted in a particular year are not completed by year-end, and the remaining sites are carried over into the next budget year and completed by the end of the first quarter.

[BEGIN PLATEAU WIRELESS HIGHLY CONFIDENTIAL INFORMATION]

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary

October 6, 2014

Page 4 of 6

[END PLATEAU

WIRELESS HIGHLY CONFIDENTIAL INFORMATION]

Response to 2(b):

HIGHLY CONFIDENTIAL Exhibit 2.b.1 – Devices contained on the enclosed CD-ROM responds to this request.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
October 6, 2014
Page 5 of 6

Response to 2(c):

In preparing the response to Request 2(a), Plateau Wireless relied on HIGHLY CONFIDENTIAL Exhibit 2.a.1. This document was in the custody of Vince Tyson, Chief Operations Officer. Plateau Wireless also relied on HIGHLY CONFIDENTIAL Exhibit 2.a.2, which information is in the custody of Ken Betz, Wireless NOC Supervisor.

In preparing the response to Request 2(b) regarding the number and percentage of Plateau Wireless's subscriber devices that are GSM, HSPA, HSPA+ and/or LTE capable, Plateau Wireless queried its billing system by International Mobile Station Equipment Identity numbers ("IMEIs"), which are used by the network to identify valid devices. Additional information or detail is available upon Commission request.

Request:

3. Provide polygons in an ESRI shapefile format representing geographic coverage for Plateau Wireless, including each mobile broadband network technology (e.g., GSM, EDGE, UMTS, HSPA, HSPA+, LTE) deployed in each frequency band (e.g., Lower 700 MHz, Cellular, AWS-1, PCS)...

Response:

HIGHLY CONFIDENTIAL Exhibit 3.1 – ESRI Shapefiles contained on the enclosed CD-ROM responds to this request and provides the polygons in ESRI shapefile format demonstrating Plateau Wireless's coverage. The polygons were generated by the Ericsson xWizard propagation tool, which Plateau Wireless uses in the ordinary course of its business to create signal level files, which are collected and compiled to create coverage maps. Inputs to the propagation tool include cell site location, antenna height, antenna down tilt, antenna azimuth (direction in which the antenna points), antenna pattern (shape of antenna signal), signal power, and topography/terrain.

Plateau Wireless uses the Wizard Default Lee Propagation Model and a 139 dB Maximum Allowable Propagation Loss ("MAPL") coverage projection. Plateau Wireless does not make any manual modifications or alter the default parameters of the model.

Request:

4. Provide the Company's quarterly subscriber data, as specified in Attachment A.

Response:

HIGHLY CONFIDENTIAL Exhibit 4.1 – Subscribers.csv contained on the enclosed CD-ROM responds to this request as specified in Attachment A to the Request.

REDACTED – FOR PUBLIC INSPECTION

Marlene H. Dortch, Secretary
October 6, 2014
Page 6 of 6

Request:

5. Provide the Company's quarterly porting data, as specified in Attachment B.

Response:

HIGHLY CONFIDENTIAL Exhibit 5.1 – Ports To and Ports From.csv contained on the enclosed CD-ROM responds to this request as specified in Attachment B to the Request.

Please direct any questions regarding this Response to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Whiteaker', with a long horizontal flourish extending to the right.

Gregory W. Whiteaker
Counsel for Plateau Wireless

Enclosures

REDACTED – FOR PUBLIC INSPECTION

Exhibit A – List of Exhibits

(All Exhibits are included on the accompanying CD-ROM)

Exhibit 2.a.1 – 4G Upgrade Site List – HIGHLY CONFIDENTIAL

Exhibit 2.a.2 – HSPA+ Carrier Site List – HIGHLY CONFIDENTIAL

Exhibit 2.b.1 – Devices – HIGHLY CONFIDENTIAL

Exhibit 3.1 – ESRI Shapefiles – HIGHLY CONFIDENTIAL

Exhibit 4.1 – Subscribers.csv – HIGHLY CONFIDENTIAL

Exhibit 5.1 – Ports To and Ports From.csv – HIGHLY CONFIDENTIAL