



[REDACTED – FOR PUBLIC INSPECTION]

November 27, 2015

Via [ECFS]

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

Re: *Applications of SprintCom, Inc., Shenandoah Personal Communications, LLC, and NTELOS Holdings Corp. for Consent to Assign Licenses and Transfer Control of Long-Term De Facto Transfer Spectrum Leasing Arrangements, WT Docket No. 15-262*

Dear Ms. Dortch:

SprintCom, Inc., a wholly owned subsidiary of Sprint Corporation (collectively “Sprint”), hereby submits its initial response to the November 13, 2015 General Information Request from the Federal Communications Commission (“FCC”) in the above-referenced proceeding.¹ This response satisfies Information Request items 6 through 9. Sprint will submit subsequent responses that satisfy Information Request items 1 through 5. Enclosed, please find:

- For Information Request item 6, a password protected CD labeled Highly Confidential Information Subject to Protective Order in WT Docket No. 15-262 Before the Federal Communications Commission, Sprint Corporation Response to Information Request Questions 6 – 9, November 27, 2015 containing spectrum license information in CSV format. A separate CD labeled Redacted Version Subject to Protective Order in WT Docket No. 15-262 has been provided that does not contain Highly Confidential or Confidential material;

¹ Letter from Roger C. Sherman, Chief, Wireless Telecommunications Bureau, FCC, to Robin J. Cohen, Sprint Corporation, WT Docket No. 15-262 (Nov. 13, 2015) (“Information Request”).

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- For Information Request item 7, a password protected CD labeled Highly Confidential Information Subject to Protective Order in WT Docket No. 15-262 Before the Federal Communications Commission, Sprint Corporation Response to Information Request Questions 6 – 9, November 27, 2015 containing ESRI shapefiles representing Sprint’s geographic coverage in each Relevant Area;
- For Information Request item 8, a password protected CD labeled Highly Confidential Information Subject to Protective Order in WT Docket No. 15-262 Before the Federal Communications Commission, Sprint Corporation Response to Information Request Questions 6 – 9, November 27, 2015 containing quarterly subscriber data in CSV format; and
- For Information Request item 9, a password protected CD labeled Highly Confidential Information Subject to Protective Order in WT Docket No. 15-262 Before the Federal Communications Commission, Sprint Corporation Response to Information Request Questions 6 – 9, November 27, 2015 containing quarterly porting data in CSV format.

In addition, in response to Information Request item 7, attached to this letter Sprint hereby provides all assumptions, methodology (*e.g.*, propagation, projection, field measurements) and data (*e.g.*, terrain, morphology, buildings) used in the production of the polygons, and identifies the propagation tool used, the propagation model used within that tool, including but not limited to, the coefficients used in the model and any additions, corrections, or modifications made to the model. A portion of this response has been redacted as confidential and not for public inspection.

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Because this submission contains electronic material that is Highly Confidential, Sprint is filing this cover letter and its enclosures pursuant to the procedures established in the Protective Order that was issued on November 13, 2015 in this docket.² This submission is being delivered by hand to the Secretary's Office, and two additional copies are being delivered to Linda Ray of the Wireless Telecommunications Bureau. Sprint also is filing a copy of this cover letter for public inspection in the FCC's Electronic Comment Filing System. If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ _____

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Enclosures

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² *Applications of SprintCom, Inc., Shenandoah Personal Communications, LLC, and NTELOS Holdings Corp. for Consent To Assign Licenses and Transfer Control of Long-Term De Facto Transfer Spectrum Leasing Arrangements; Application of Shenandoah Personal Communications, LLC. and NTELOS Holdings Corp. for Consent to Transfer Control of an International Section 214 Authorization, Protective Order, WT Docket No. 15-262, DA 15-1300 (WTB rel. Nov. 13, 2015).*

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**ATTACHMENT
ADDITIONAL INFORMATION RESPONSE 7**

Question 7. Provide polygons in an ESRI shapefile format representing geographic coverage for Sprint in each Relevant Area, including each mobile broadband network technology (e.g., CDMA, EVDO, EV-DO Rev. A, GSM, EDGE, UMTS, HSPA, HSPA+, LTE) deployed in each frequency band (e.g., Lower 700 MHz, SMR, Cellular, AWS-1, PCS, EBS/BR5). Provide all assumptions, methodology (e.g., propagation, projection, field measurements), calculations (including link budgets), tools (e.g., predictive and field measurements) and data (e.g., terrain, morphology, buildings) used in the production of the polygons, and identify the propagation tool used, the propagation model used within that tool, including but not limited to, the coefficients used in the model and any additions, corrections or modifications made to the model.

For Information Request item 7, a password protected CD labeled Highly Confidential Information Subject to Protective Order in WT Docket No. 15-262 Before the Federal Communications Commission, Sprint Corporation Response to Information Request Questions 6 – 9, November 27, 2015 containing ESRI shapefiles representing Sprint’s geographic coverage in each Relevant Area has been provided.

All polygons were generated by InfoVista’s Mentum PlaNet propagation modeling tool, which is utilized by all Sprint Markets in its ordinary course of its business to create all technology/spectrum signal level files (RSSI & RSRP values).

The various criteria inputs to the propagation tool include; cell site location, antenna height, antenna downtilt, antenna azimuth (direction antenna is pointed in degrees), antenna pattern (shape of respective antenna propagation characteristics), site/sector signal power, topographical and terrain factors, clutter (the physical land use/vegetation obstructions) which impact the propagation of radio waves aside from the area topography.

Sprint customizes the InfoVista Mentum PlaNet propagation tool primarily through the use of a library of area-specific “propagation models.” These leverage current geographic terrain, clutter information and drive test data inputs. Market specific Geodata is also used in this process. Sprint uses the following signal strength measurements for its own coverage depiction:

[Begin Confidential Information]



[End Confidential Information]

In addition, Sprint has relied upon NTELOS to provide ESRI information regarding any NTELOS geographic coverage utilizing Sprint's spectrum pursuant to existing agreements between the Companies. That information is included in Sprint's submission of information in response to Information Request 7. NTELOS has provided its own ESRI information and methodology used in determining geographic coverage and Sprint incorporates the NTELOS submission by reference.