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August 1, 2009

**REQUEST FOR CONFIDENTIAL TREATMENT**

Received & Inspected

AUG 3 - 2009

FCC Mail Room

**Via Overnight Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9300 East Hampton, Drive  
Capitol Heights, MD 20743

Universal Service Administrative Company (USAC)  
Attn: USAC Customer Service  
Form 499 Data Collection Agent  
2000 L St. NW, Suite 200  
Washington, DC 20036

Re: *T-Mobile Puerto Rico, Inc. - Consolidated Universal Service Fund  
Reporting and Traffic Study*  
Form 499 Filer ID: 825855  
WC Docket No. 06-122

Dear Ms. Dortch and USAC:

Per the Federal Communications Commission's (Commission or FCC) directives, including a recent order regarding Universal Service Fund (USF) contribution methodology, T-Mobile Puerto Rico, Inc. (T-Mobile) is filing its Form 499-Q for August 1, 2009, and a traffic study (1) detailing the sampling and estimation methods used and (2) explaining why the study is unbiased and meets accuracy thresholds.<sup>1</sup> A hard copy of the Form 499-Q and the traffic study is being filed with USAC. A copy of the traffic study also is being filed with the FCC. Please date-stamp the enclosed "return" copy of this submission and return it in the self-addressed envelope.

Consistent with the confidential nature of the Form 499-Q filing, see 47 C.F.R. §§ 52.16(c), 54.711(b), 64.604(c)(iii)(1), T-Mobile requests confidentiality for the traffic study filing in accordance with 49 C.F.R. § 0.459. The following information supports the request for confidentiality under Section 0.459(b) of the Commission's Rules:

<sup>1</sup> *In the Matter of Universal Service Contribution Methodology*, WC Docket No. 06-122, Report and Order and Further Notice of Proposed Rulemaking (rel. June 27, 2006), ¶ 32.

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- (1) The information for which confidential treatment is requested includes all pages of the traffic study.
- (2) This information is being submitted as required by the Commission's recent order.<sup>2</sup>
- (3) This information is highly confidential and competitively sensitive information concerning the jurisdictional classification of T-Mobile's traffic. This information will be used to determine T-Mobile's universal service contribution amounts, thus implicating important financial information. As such, it is very sensitive commercial and financial information.
- (4) The information concerning the domestic interstate and international telecommunications services that T-Mobile provides and from which its universal service payment obligations are derived is highly competitive, with numerous wireless carriers serving these markets.
- (5) Disclosure of the financial information would cause significant competitive harm to T-Mobile by disclosing the jurisdictional breakdown of its traffic and its universal service fund payment obligations from which competitors could derive information concerning T-Mobile's business operations, customer calling patterns, and reported revenues.
- (6) T-Mobile treats this information as highly confidential, and does not publicly disclose this information. In addition, within the company distribution is limited to employees on a "need to know" basis.
- (7) This information is not available to the public, and has not previously been disclosed to third parties (other than agents of T-Mobile on a confidential, "need to know" basis, such as outside counsel or accountants).
- (8) T-Mobile believes this information should be permanently withheld from public disclosure, given the highly sensitive nature of the information.
- (9) Nondisclosure of such information is expressly provided for in the Commission's rules.<sup>3</sup>

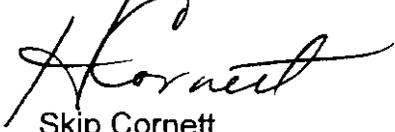
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<sup>2</sup> See note 1, *supra*.

<sup>3</sup> See 47 C.F.R. §§ 52.16(c), 54.711(b), 64.604(c)(iii)(I).

With the foregoing in mind, T-Mobile respectfully requests confidential treatment of the enclosed traffic study. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Skip Cornett", written in a cursive style.

Skip Cornett  
Vice President - Taxation  
T-Mobile USA, Inc.

cc: Jim Lande  
Amy Bender

**T-Mobile USA Traffic Study for Federal Universal  
Service Fund Filing**

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