

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20054**

In the Matter of	)	
	)	
Review of Wireline Competition Bureau Data Practices	)	WC Docket No. 10-132
	)	
Review of Wireless Telecommunications Bureau Data Practices	)	WT Docket No. 10-131
	)	

**REPLY COMMENTS OF SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation (“Sprint”) respectfully submits these Reply Comments in the above-captioned proceedings in response to the Federal Communication Commission’s Public Notices seeking comment on the Wireline Competition Bureau’s and the Wireless Telecommunications Bureau’s data collection practices.<sup>1</sup> As discussed below, Sprint agrees with the commenting parties that suggest that several of the data collected by the two bureaus are out-of-date or no longer useful and should be either revised or eliminated.

The most onerous report that international wireline carriers must submit, in Sprint’s estimation, is international traffic report required by section 43.61 of the Commission’s rules, 47 C.F.R. § 43.61. Sprint and other carriers have proposed modifications to the report that would reduce the number of categories of revenue and traffic information, thereby making it significantly easier to produce. In a recent meeting with the staff of the International Bureau, Sprint and AT&T urged them to take action to revise the data requested so as to reduce the

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<sup>1</sup> *Pleading Cycle Established for Comments on Review of Wireline Competition Bureau Data Practices*, WC Docket No. 10-132 (June 29, 2010); *Pleading Cycle Established for Comments on Review of Wireless Telecommunications Bureau Data Practices*, WT Docket No. 10-131 (June 29, 2010).

burden.<sup>2</sup> At a minimum, Sprint requests that the Commission eliminate the filing of the quarterly section 43.61 reports. The Commission adopted this reporting requirement to track international settlement rates and detect market-distorting price squeeze behavior.<sup>3</sup> Now that the international markets are fully competitive, there is no reason to monitor for anticompetitive behavior. Thus, the quarterly section 63.61 report no longer serves any useful purpose.

Sprint also recommends eliminating the reporting of international submarine cable capacity pursuant to section 43.82. According to the instructions for the report, carriers must report “the number of 64 Kilobits per second (Kbs) or 3 or 4 KiloHertz (Khz) equivalent bearer circuits and also derived circuits.”<sup>4</sup> This sorely out-of-date measure of circuit capacity for high-capacity submarine cables was used as the basis of Federal Regulatory Fees until 2009 when the Commission adopted a new payment methodology.<sup>5</sup> The Commission now calculates the regulatory fees based on the capacity in Gigabits per second (GBPS) of the cable system. Since carriers no longer pay their Federal Regulatory Fees for submarine cable systems based on the number of 64 Kbs circuits, the reporting and manipulation of submarine cable capacity into this Kbs structure is no longer needed or warranted.

Concerning wireless reporting, Sprint agrees with Verizon that applications for subleasing spectrum in secondary markets that are currently filed on paper should be filed

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<sup>2</sup> See Notice of Ex Parte Communication, *Reporting Requirements for U.S. Providers of International Communications Services*, IB Docket No. 04-112, filed on February 25, 2010 by Sprint.

<sup>3</sup> See *International Settlement Rates*, 12 FCC Rcd 19806, 19909 ¶ 226 (1997).

<sup>4</sup> See *FCC Report 43.82, Manual for Filing Section 43.82 Circuit Status Data in accordance with the FCC’s Rules and Regulations*, OMB No.: 3060-0572, Expiration Date: 10/31/2005, page 15, at <http://www.fcc.gov/ib/pd/pf/csmanual.html>.

<sup>5</sup> See *Assessment and Collection of Regulatory Fees for Fiscal Year 2008*, MD Docket No. 08-65, RM-11312, 24 FCC Rcd 4208 (2009).

electronically.<sup>6</sup> As Verizon notes, paper filings may result in processing delays and errors that would be avoided by electronic filings. Thus, the Commission should update the processing of these applications.

Sprint also agrees with Verizon that the Form 477 report should be reviewed in light of the information now being collected by the National Telecommunications and Information Administration (“NTIA”) through the Broadband Data Improvement Act (“BDIA”).<sup>7</sup> To the extent that detailed information concerning broadband coverage and speed is being collected by NTIA, the Commission should reduce the burdensome speed and geographic data for wireless connections on the Form 477.<sup>8</sup> NTIA’s data should be integrated with other Form 477 data to analyze and evaluate broadband deployment.

Sprint appreciates the Commission review of the data that it collects from carriers and urges it to eliminate outdated and unused data collections, which require the carriers’ time and resources and are costly to produce.

Respectfully submitted,

**SPRINT NEXTEL CORPORATION**

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<sup>6</sup> See Comments of Verizon and Verizon Wireless filed August 13, 2010, at 9.

<sup>7</sup> *Id.* at 7.

<sup>8</sup> For example, Sprint provided approximately 14,000 lines of Census Tract data for California in Part VI of its most recent Form 477.