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April 5, 2012

VIA HAND DELIVERY

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

Re: Cellco Partnership d/b/a Verizon Wireless Supplement to Response to Information and Discovery Request, VZW-TPK-FCC-90005 and Additional Document Production

Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo, LLC For Consent To Assign Licenses and Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC For Consent To Assign Licenses, WT Docket No. 12-4

Dear Ms. Dortch:

On March 22, 2012, Cellco Partnership d/b/a Verizon Wireless filed its response to the FCC Information and Discovery Request of March 8, 2012 in the above-referenced docket.¹ That response has been updated and supplemented in subsequent filings. By this filing, Verizon Wireless provides further data and documents in response to the FCC's Information and Discovery Request including:

- A supplemental document production in Summation format containing materials from additional custodians specified by the FCC, which is being provided on the attached USB Drive. The document supplement also includes documents identified as responsive to the requests since the March 22 production. These materials have been individually tagged as either "Public", "Confidential" and subject to the *Protective Order* in this proceeding,² or "Highly Confidential" and subject to the *Second Protective Order* in this proceeding.³

¹ Information and Discovery Request for Verizon Wireless (attachment to Letter from Rick Kaplan, Chief, Wireless Telecommunications Bureau, FCC, to Michael Samscock, Cellco Partnership, dba Verizon Wireless, WT Docket No. 12-4 (dated March 8, 2012)). The FCC updated and modified Request 3 on March 13, 2012.

² See Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC For Consent To Assign Licenses and Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC For Consent To Assign Licenses, *Protective Order*, WT Docket No. 12-4 (rel. Jan. 17, 2012), available at: http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db0117/DA-12-50A1.pdf (last visited Mar. 19, 2012).

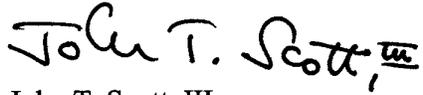
³ See Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC For Consent To Assign Licenses and Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless,, *Second Protective Order*, WT

- A privilege log for the added documents, as well as an index associated with that privilege log and the prior privilege log containing descriptions of the individuals referenced in the privilege logs. The supplemental privilege log has been provided on the USB Drive in a folder titled VZW-TPK-FCC-90005, with the filename “Supp Priv Log 04-04-12_HIGHLY_CONFIDENTIAL.xls.” The index has been provided in the same directory with a filename “VZW_Job_Descriptions_HIGHLY_CONFIDENTIAL.csv.” These documents contain descriptions of privileged communications or specific, individualized information about particular Verizon Wireless and outside counsel, and therefore should be treated as “Highly Confidential” under the *Second Protective Order*.
- A data file supplement to Request 3 has been provided with the filename “FCC_BH%_2012_03a_HIGHLY_CONFIDENTIAL.csv” in the folder on the USB Drive titled VZW-TPK-FCC-90005, as well as a related “Traffic Table Read_me v1.6_HIGHLY_CONFIDENTIAL.xlsx” file describing the format of that table. This file shows the Verizon Wireless busy hour traffic percentage for March 2012, per discussions with staff. This data is very sensitive and proprietary network data from Verizon Wireless and, like the other data provided in response to Item 3, should be treated as “Highly Confidential” pursuant to the *Second Protective Order* in this proceeding.
- A list, attached hereto as “Exhibit A,” providing the names of the custodians who supplied documents which were reviewed for responsiveness to the Company’s response to data requests that sought all documents on particular subjects. The list also enumerates other employees who identified additional documents responsive to certain data requests
- A table with the filename “Q4-List of Reports_4-5-2012_CONFIDENTIAL.docx” has been provided in the VZW-TPK-FCC-90005 directory in response to Request 4 and pursuant to discussions with FCC staff that provides a list of regular internal reports related to the issues raised by the questions in the Information and Document Request. This document should be treated as “Confidential” pursuant to the *Protective Order* in this proceeding.

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Should any questions arise concerning this filing or the electronic media provided in connection with this filing, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a horizontal line underlining the name.

John T. Scott, III

cc: John Spencer, WTB (w/encl.)

EXHIBIT A
Custodian List

Commission staff has also requested that the Company provide a list of custodians who supplied documents which were reviewed for responsiveness to the Company's response to data requests that sought all documents on particular subjects. The custodian list is as follows:

Ivan Seidenberg, former Chief Executive Officer, Verizon
Lowell McAdam, Chief Executive Officer, Verizon
Daniel Mead, Chief Executive Officer, Verizon Wireless
Andrew Davies, Chief Financial Officer, Verizon Wireless
David Small, Vice President and Chief Technical Officer, Verizon Wireless
Beth Drohan, Area Vice President – Network, Verizon Wireless
David Heverling, Area Vice President – Network, Verizon Wireless
Walter Jones, Area Vice President – Network, Verizon Wireless
Hans Leutenegger, Area Vice President – Network, Verizon Wireless
Adam Koeppe, Area Vice President – Network, Verizon Wireless
Mary Aldrich, Executive Director – Network, Verizon Wireless
Philip French, Executive Director – Network, Verizon Wireless
Jack Tang, Executive Director – Network, Verizon Wireless
Margaret Feldman, Vice President, Business Development & Planning, Verizon Wireless
Philip Junker, Executive Director, Strategic Alliances, Verizon Wireless
Dominic DiBucci, Staff Vice President, Strategic Planning, Verizon Wireless
John Bareham, Manager, Business Analysis, Finance, Verizon Wireless
William Stone, Executive Director, Technology, Corporate Technology, Verizon
Stanley Zadrozny, Executive Director, Technology, Corporate Technology, Verizon
Joseph Moravec, Staff Vice President, Finance, Verizon

FCC staff has also requested that Verizon Wireless identify other employees who identified additional documents responsive to certain data requests. Those employees are listed below:

For Question 27:

Jeremy Bolton, Executive Director, Strategic Planning, Verizon Wireless
Steven Mesnick, Director, Marketing, Verizon Wireless
Jane Schapker, Executive Director, Governance & Asst. Corporate Secretary, Verizon

For Question 31:

Derek Bao, Director – Technology, Verizon Wireless
Craig Frost, Executive Director – Network, Verizon Wireless
Kevin McDonough, Director, Network Operations, Verizon Wireless
Mike Millegan, President, Global Wholesale, Verizon Enterprise
Jane Schapker, Executive Director, Governance & Asst. Corporate Secretary, Verizon
Karen Shipman, Associate Director, Legal, Verizon Wireless

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For Question 32:

Rosemarie Clayton, Senior Consultant, Product Management/Development,
Verizon Enterprise

John Dierksen, Executive Vice President, Strategy, Development & Planning, Verizon

Anthony Heyman, Area President – Marketing, Verizon Wireless

Jane Schapker, Executive Director, Governance & Asst. Corporate Secretary, Verizon