JOHN T. SCOTT
VP & Deputy General Counsel

FILED/ACCEPTED

APR 26 2012

Federal Communications Commission
Office of the Secretary

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April 27, 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

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 is providing further documents in response to the FCC's Information and Discovery Request including:

- As requested by FCC staff, we are providing additional documents based upon certain revised searches discussed with the staff.[2] The updated materials address requests referred to in questions 9b-d, 12, 21, 30, 35a-b, and 36 of the FCC's Information and Discovery Request, and have been placed on a disk titled "VZW-006." Exhibit A hereto provides the names and titles of the additional custodians whose documents are

[1] Information and Discovery Request for Verizon Wireless (attachment to Letter from Rick Kaplan, Chief, Wireless Telecommunications Bureau, FCC, to Michael Samsock, 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] VZW-006 also includes a subset of documents that was removed from VZW-005 because the documents were inadvertently assigned overlapping bates numbers with previously produced documents. The documents have been assigned new bates numbers and are being provided to the FCC in VZW-006. *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, WT Docket No. 12-4,* Supplement to Response of Cellco Partnership d/b/a Verizon Wireless to Information and Discovery Request, WT Docket No. 12-4 (filed April 25, 2012).

being provided. Exhibit C hereto provides the modified search terms used to identify these documents.

- Also as requested by FCC staff, we are providing additional documents identified as responsive to the FCC's request in question 31. The additional documents have been placed on a disk titled "VZW-007." As discussed with FCC staff, by including such materials and identifying these individuals as custodians in the metadata, Verizon Wireless is not implying or representing that the entirety of their files has been digitized or electronically searched, or that a broader search of their materials has been undertaken in connection with the "all documents" requests. Exhibit B hereto provides the names and titles of the additional custodians whose documents are being provided as responsive to the FCC's request in question 31.

- An overlay updating responsive tagging for documents previously produced as responsive to the FCC's requests that have also been identified as responsive to requests referred to in 9b-d, 12, 21, 30, 35a-b, or 36 by the revised search terms.[3]

- As discussed with staff, given the subject matter of the requests to which these documents are responsive, and in order to expedite this production, all documents have been temporarily designated "Highly Confidential" under the *Second Protective Order* in this docket.[4] Verizon Wireless will shortly provide a database overlay that will downgrade that designation from "Highly Confidential" to either "Confidential" (as defined under the *Protective Order* in this docket) or "public," where appropriate, based on a review now underway.

- Two files titled "Priv_Log_20120426_HIGHLY_CONFIDENTIAL.xls" and "Priv_Log_VZW_007_20120426_HIGHLY_CONFIDENTIAL.xls" included on the encrypted hard drive containing the supplemental production providing privilege log data for items flagged by the search terms for the new custodians.

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

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[3] The overlay updates documents provided to the FCC in Summation format on March 22, 2012 (as revised by the March 26, 2012 filing), April 5, 2012, April 19, 2012, and April 25, 2012.

[4] *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 Docket No. 12-4 (rel. Jan. 17, 2012), available at: http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db0117/DA-12-51A1.pdf (last visited Mar. 19, 2012).

Sincerely,

John T. Scott, III

John T. Scott, III

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

EXHIBIT A
CUSTODIAN LIST FOR VZW-006

The custodians for this filing are as follows:

Lowell McAdam, Chairman & Chief Executive Officer, Verizon
Ivan Seidenberg, Former Chairman & Chief Executive Officer, Verizon
Daniel Mead, Executive Vice President, President & CEO, Verizon Wireless
Andrew Davies, Vice President & Chief Financial Officer, Verizon Wireless
Joseph Moravec, Staff Vice President, Finance, Verizon Wireless
Anthony Melone, Executive Vice President & Chief Technology Officer, Verizon
W.R. Mudge, President, Consumer & Mass Business Markets
Francis Shammo, Executive Vice President & Chief Financial Officer, Corporate Finance
John G. Stratton, Executive Vice President & President, Verizon Enterprise
Shaygan Kheradpir, Former Chief Information Officer, Verizon
John Diercksen, Executive Vice President, Strategy, Development & Planning, Verizon
John Fitzgerald, Vice President, Strategy, Development & Planning, Verizon
Carl E. Palitti, Director, Finance, Verizon
Margaret P. Feldman, Vice President, Business Development & Planning, Verizon Wireless
Theresa Kemp, Executive Coordinator for Mr. Mead, Verizon Wireless
David Small, Vice President & Chief Technical Officer, Network, Verizon Wireless
Marni M. Walden, Executive Vice President & Chief Operating Officer, Verizon Wireless
Armen DerMarderosian, Director, Alternative Distribution, Verizon Wireless
Allyson Turco, Executive Director, National Retail Operations, Marketing, Verizon Wireless
Anthony W. Heyman, Staff Vice President, Marketing, Verizon Wireless
Matthew W. Carr, Director, Sales Operations, Verizon Wireless
Rezie Jan, Director, Marketing, Verizon Wireless
Kerry Wozniak, Director, Marketing, Verizon Wireless
Shadman Zafar, Senior Vice President, Corporate Technology, Verizon Wireless
Allissa Van Volkom, Director, Marketing, Verizon Wireless
Cheryl Beach, Associate Director, Marketing, Verizon Wireless
Marc S. Diamondstein, Associate Director, Marketing, Verizon Wireless
Chen-Chang Lien, Senior Project Manager, Marketing, Verizon
Woody J. Saleh, Manager, Marketing, Verizon Wireless
John Colaiuti, Staff Vice President, Marketing, Verizon Wireless
Claire Beth Nogay, Senior Vice President, Corporate Technology, Verizon
Kevin N. Smith, Director, Network Engineering, Corporate Technology, Verizon
Andis I. Kalnins, Manager, Network Engineering, Corporate Technology, Verizon
Keiko Harvey, Former Senior Vice President for Video Network Services, Verizon
Ruchir Rodrigues, Vice President, Corporate Technology, Verizon
Shawne L. Angelle, Region President, Consumer & Mass Business Markets, Verizon Telecom
William F. Foshay, Area President, Consumer & Mass Business Markets, Verizon Telecom
Christopher D. Childs, Region President, Consumer & Mass Business Markets, Verizon Telecom
Mary Ellen Payne, Vice President, Consumer & Mass Business Markets, Verizon Telecom
Timothy Smith, Region President, Consumer & Mass Business Markets, Verizon Telecom
Paul A. Sullivan, Region President, Consumer & Mass Business Markets, Verizon Telecom
Jeanmarie Milla, Region President, Consumer & Mass Business Markets, Verizon Telecom

Margaret C. Serjak, Region President, Consumer & Mass Business Markets, Verizon Telecom
Kevin M. Service, Area President, Consumer & Mass Business Markets, Verizon Telecom
Susan M. Retta, Vice President, Consumer & Mass Business Markets, Verizon Telecom
Tracey A. Edwards, Region President, Consumer & Mass Business Markets, Verizon Telecom
Shawn M. Strickland, Region President, Consumer & Mass Business Markets, Verizon Telecom
Michael F. Ritter, Chief Marketing Officer, Consumer & Mass Business Markets, Verizon Telecom
Colette J. Wycech, Director, Market Research, Consumer & Mass Business Markets, Verizon Telecom
Richard Kolb, Director, Product Management & Product Development, Consumer & Mass Business Markets, Verizon Telecom
Eric J. Bruno, Vice President, Consumer & Mass Business Markets, Verizon
John D. Broten, Director, Product Management & Product Development, Consumer & Mass Business Markets, Verizon Telecom
Michael Solari, Manager, Product Management & Product Development, Consumer & Mass Business Markets, Verizon Telecom
Dustin P. Kroeger, Director, Product Management & Product Development, Consumer & Mass Business Markets, Verizon Telecom
James R. Moran, Director, Product Management & Product Development, Consumer & Mass Business Markets, Verizon Telecom
Michelle Swittenberg, Vice President, Consumer & Mass Business Markets, Verizon Telecom
Jeffrey Noto, Vice President & Chief Finance Officer, Corporate Finance, Verizon
Debra A. Kaufman, Vice President, Corporate Finance, Verizon
James F. Morgan, Director, Financial Planning & Analysis, Corporate Finance, Verizon
Michael Stefanski, Senior Vice President, Corporate Finance, Verizon
William Sansalone, Vice President & Controller, Finance, Verizon Wireless
Steven Zipperstein, Former VP General Counsel & Secretary, Verizon Wireless
Karen Shipman, Associate Director, Legal, Verizon Wireless
Beth Drohan, Area Vice President, Network, Verizon Wireless
David Heverling, Area Vice President, Network, Verizon Wireless
Mary Aldrich, Executive Director, Network, Verizon Wireless
Phillip French, Executive Director, Network, Verizon Wireless
Jack Tang, Executive Director, Network, Verizon Wireless
Adam Koeppe, Area Vice President, Network, Verizon Wireless
Hans Leutenegger, Area Vice President, Network, Verizon Wireless
Philip Junker, Executive Director, Strategic Alliances, Verizon Wireless
John Bareham, Manager, Business Analysis, Business Development, Verizon Wireless
Bob Lashkari, Former Manager, Business Analysis, Business Development, Verizon Wireless
Dominic Dibucci, Staff Vice President, Strategic Planning, Finance, Verizon Wireless
William Stone, Executive Director, Technology, Corporate Technology, Verizon
Stanley Zadrozny, Executive Director, Technology, Corporate Technology, Verizon
Jeff Stuparits, Distinguished MTS, Corporate Technology, Verizon
Brian Mecum, Director, Technology, Network, Verizon Wireless
Board Docs
Business Development Share Drive
Finance Share Drive
FCC Production

EXHIBIT B
CUSTODIAN LIST FOR VZW-007

The custodians for this filing are as follows:

Quinten Lew, Senior Vice President, Verizon Enterprise
Jordan Purcell, Senior Consultant, Product Management, Verizon Enterprise
Sean Sullivan, Director, Product Management, Verizon Enterprise

EXHIBIT C
SEARCH TERMS

FCC Spec	Search Terms
12	"spectral efficiency" & (calculate calculates calculated calculation calculations)
21	(spectrum/5 valuation spectrum /5 value spectrum /5 appraisal spectrum /5 appraise AWS /5 valuation AWS /5 value AWS /5 appraisal AWS /5 appraise) & (spectrumco /5 agreement cox /5 agreement turnpike tpk)
35a	(spectrum & ((spectrumco /5 agreement cox /5 agreement) turnpike tpk))
35b	See 35a
36	(impact /5 competition impact /5 competitor impact /5 competitors impact /5 compete effect /5 competition effect /5 competitor effect /5 competitors effect /5 compete impact /5 "AT&T" effect /5 "AT&T" impact /5 Sprint effect /5 Sprint impact /5 "T-Mobile" effect /5 "T-Mobile" impact /5 tmo effect /5 tmo impact /5 "U.S. Cellular" effect /5 "U.S. Cellular effect /5 "US Cellular" impact /5 "US Cellular" effect /5 "USCC" impact /5 "USCC" impact /5 MetroPCS effect /5 MetroPCS impact /5 MPCS effect/5 MPCS impact /5 leap effect /5 leap impact /5 cricket effect /5 cricket impact /5 revol effect /5 revol impact /5 "C-Spire" effect /5 "C-Spire" impact /5 "Cellular South" effect /5 "Cellular South" impact /5 cellso effect /5 cellso impact /5 clso effect /5 clso) & agreement & (resale JOE "joint venture" MSA reseller agent agency) % "daily news" % "news bulletin"
9b	(spectrum /5 exhaust spectrum /5 constrain spectrum /5 constraint spectrum /5 constrained capacity /5 exhaust capacity /5 constrain capacity /5 constraint capacity /5 constrained)
9c	(capacity /10 constrain!)
9d	(spectrum & (spectrumco /5 deal spectrumco /5 transaction spectrumco /5 acquisition cox /5 deal cox /5 transaction cox /5 acquisition turnpike tpk))

spc	Logical "OR"
&	Logical "AND"
/x	Terms occur within x words of one another
%	Logical "AND NOT"
!	Root expander