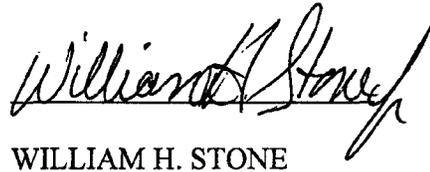


may understate actual LTE traffic, causing service constraints to occur earlier and/or at many more sectors than are currently projected. Even assuming that the current projections remain on target, they clearly demonstrate that in the affected markets, the AWS spectrum included in the exchange with T-Mobile is needed to help meet growing customer demand for LTE.

11. Historically Verizon Wireless has used numerous methods to increase spectral efficiency, and we will continue to do so as we move forward with LTE. For example, the company intends to deploy LTE small cells extensively, and will also use cell splitting, femto cells, Wi-Fi offloading, and refarming of PCS spectrum that is currently being used to support our 3G EVDO network when that spectrum becomes available in sufficient contiguous amounts to make its use for LTE feasible. However, as I explained previously, these techniques simply cannot keep up with the extraordinary growth of demand on our network.<sup>4</sup> Even with use of these techniques, our customers' sharply increasing use of our LTE network means that we must obtain additional spectrum to serve those customers with the quality and reliability of service that we want to provide and that our customers expect.

I hereby declare under penalty of perjury that the foregoing declaration is true and correct to the best of my knowledge and belief. Dated this 17<sup>th</sup> day of July, 2012.

  
WILLIAM H. STONE

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<sup>4</sup> Stone Supplemental Declaration at ¶¶ 24-26, ¶¶ 39-48.































# Mapping Summary of Markets in T-Mobile Deal: Cell Sector-by-Sector Constraints

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# Data/Voice/SMS Traffic Projection

Wireless Access Planning

May 23<sup>rd</sup>, 2012

- Preliminary Draft -



# EOY Device Mix

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# Smartphone migration/growth



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# MB/Mo Usage per Device/Technology



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# 1xRTT/EVDO Assumptions

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# LTE Assumptions





# Data Usage

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Data



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# Voice Usage



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**Voice**



**{{**

**}}**



# SMS Usage

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**SMS**



**{{**

**}}**



# Home Fusion Usage

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## CERTIFICATE OF SERVICE

I, Neil Alan Chilson of Wilkinson Barker Knauer, LLP, hereby certify that the foregoing Joint Opposition (Redacted – For Public Inspection) was served this seventeenth day of July, 2012, by depositing a true copy thereof with the United States Postal Service, first class postage pre-paid, addressed to the parties listed below. Courtesy email copies were also sent where email addresses were available, as also indicated below.

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