



T-Mobile USA, Inc.
601 Pennsylvania Avenue, NW
North Building, Suite 800
Washington, DC 20004

January 22, 2013

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation

WC Docket Nos. 11-10, 07-38, 08-190, and 10-132: *Modernizing the FCC Form 477 Data Program*

Dear Ms. Dortch:

On January 17, 2013, at the Commission's request, T-Mobile USA, Inc. ("T-Mobile") representatives Luisa L. Lancetti, Shannon Reilly Kraus, and I participated in a conference call to discuss the Commission's pending rulemaking seeking to streamline and improve the Form 477 data collection process. Representing the Commission on the call were Susan Singer, Tom Peters, and Mitali Shah of the Wireless Telecommunications Bureau, and Lisa Gelb, Steve Rosenberg, Travis Litman, Ken Lynch, Chelsea Fallon, Ellen Burton, Carol Simpson, and Roger Woock of the Wireline Competition Bureau.

Staff explained that the FCC's goal is to improve data collection while minimizing providers' reporting burdens. To this end, the Commission is considering use of a client-side application to be used to produce data provided in the Form 477. Staff asked about the kinds of collections we are able to do now and how such an application might help to make the process seamless. Recognizing that carriers have varied billing systems, they asked how T-Mobile would extract information from its particular systems to feed into the application. T-Mobile expressed concern about billing extracts being the best tool and other systems limitations. Commission staff then asked about using a smaller geography for subscription reporting to allow better and different analysis and whether there would be a difference from the carrier's point of view in using one geography over another. T-Mobile replied that without seeing what our output looks like, we could not say whether this would decrease our burden. We also briefly discussed limits on the relevance of reporting speed tier information from mobile service providers, where different factors will affect customer speed and performance.

Ms. Marlene H. Dortch

January 22, 2013

Page 2

Next, staff asked whether – if the data collection currently done by NTIA were eventually moved over to the FCC to handle – a single process for providing broadband adoption and deployment data might reduce carrier collection and reporting burdens. T-Mobile thought it might but explained that currently the NTIA collection is preferable because it requires us to provide a map file whereas the Commission requires us to provide census tract information in a spreadsheet, which is more complicated to produce. Finally, we also briefly discussed privacy and security concerns inherent when collecting data from behind carriers' firewalls.

Pursuant to Commission rules, please include this notice in the above dockets.

Respectfully submitted,

/s/

Indra Sehdev Chalk

Principal Corporate Counsel, Federal Regulatory Affairs

cc: Susan Singer
Tom Peters
Mitali Shah
Lisa Gelb
Steve Rosenberg
Travis Litman
Ken Lynch
Chelsea Fallon
Ellen Burton
Carol Simpson
Rodger Woock