



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

February 11, 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 February 8, 2013, at the Commission's request, T-Mobile USA, Inc. ("T-Mobile") representatives Luisa L. Lancetti, Shannon Reilly Kraus, Jeni Santana, 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, Nese Guendelsberger, Eliot Maenner, Michael Jansen, and Mitali Shah of the Wireless Telecommunications Bureau, and Travis Litman, Chelsea Fallon, Ellen Burton, and Kenneth Lynch of the Wireline Competition Bureau.

Staff began by discussing the possibility of the FCC's taking over the data collection currently performed by NTIA and making it a part of the Form 477 data collection process. T-Mobile said that it agrees that a single process for providing broadband adoption and deployment data on a nationwide basis likely would be preferable to the current FCC reporting that requires collecting data at the census tract level and having to file a separate report for each state.

Staff explained that if it were to take over the data collection, it would ask providers to create shape files by technology and spectrum band with different maps for different *advertised* uplink and downlink speed ranges as opposed to test speeds or actual speeds.

Staff also discussed possible changes to the collection process that would allow the Commission to put subscribers into speed tiers by using subscriber count, technology, and speed information. T-Mobile expressed uncertainty as to whether we could provide this data for all of our customers and explained that we would have to look into whether we could compile this information for prepaid subscribers.

Staff asked if on a nationwide level, T-Mobile could provide the total number of what are referred to as "connected devices" not broken down by machine type but by technology. Staff explained that we currently provide subscriber counts for customers able to access web content of their choice but that this excludes M2M, eReaders, alarm systems, and so on. Collecting total

Ms. Marlene H. Dortch

February 11, 2013

Page 2

numbers of these types of devices by the highest technology capability of the device is something the Commission is interested in doing.

Finally, staff said that the data collection application is still under consideration and that carrier involvement in collaborating on beta tests is a possibility.

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  
Nese Guendelsberger  
Eliot Maenner  
Michael Jansen  
Mitali Shah  
Travis Litman  
Chelsea Fallon  
Ellen Burton  
Kenneth Lynch