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BY ELECTRONIC FILING

David Furth, Deputy Bureau Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Extension of Irrevocable Letter of Credit for 800 MHz Band Reconfiguration, WT Docket No. 02-55

Dear Mr. Furth:

Sprint Nextel Corporation (“Sprint”) is pleased to inform the Federal Communications Commission (“Commission”) that it has extended the term of its 800 MHz Band Reconfiguration Irrevocable Letter of Credit (“LOC”) through February 2018.¹ Extending the LOC assures that incumbent licensees that must retune, pursuant to the Commission’s 800 MHz Reconfiguration Decision (“*R&O*”), will receive the funds necessary to retune their communications systems consistent with the provisions of the *R&O*.² The LOC had been set to expire on October 24, 2013.

On March 7, 2005, Sprint submitted a series of documents and certifications pursuant to paragraph 344 of the 800 MHz *R&O* demonstrating that it had secured access to a \$2.5 billion irrevocable LOC. Sprint does not use the LOC for the day-to-day payment of expenses incurred by incumbents and/or their vendors and suppliers for 800 MHz Reconfiguration; rather, the Commission requires Sprint to maintain the LOC as a stand-by funding mechanism or security

¹ The 800 MHz Letter of Credit is part of Sprint’s overall revolving credit facility now in place through February 2018. Sprint anticipates that 800 MHz reconfiguration will be completed well in advance of that date, at which point any remaining Letter of Credit reserved for the 800 MHz would be cancelled and would become available for other corporate purposes.

² See *Improving Public Safety Communications in the 800 MHz Band; Consolidating the 800 and 900 MHz Industrial/Land Transportation and Business Pool Channels*, Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order, 19 FCC Rcd 14969, ¶ 344 (2004) (“*R&O*”), as amended by Erratum, WT Docket No. 02-55 (rel. Sep. 10, 2004); Second Erratum, 19 FCC Rcd 19651 (2004); Public Notice, “Commission Seeks Comment on Ex Parte Presentations and Extends Certain Deadlines Regarding the 800 MHz Public Safety Interference Proceeding,” 19 FCC Rcd 21492 (2004); Third Erratum, 19 FCC Rcd 21818 (2004); Supplemental Order and Order on Reconsideration, 19 FCC Rcd 24708, ¶ 9 (2004) (“*Supplemental Order*”); and Erratum, WT Docket No. 02-55 (rel. Jan. 19, 2005).

against Sprint's unlikely default on these obligations. In other words, the LOC ensures that sufficient funds will be available to meet the retuning costs of 800 MHz incumbents required to retune under the Commission's rebanding plan, notwithstanding any adverse change in Sprint's financial condition. To date, Sprint has paid all qualified incumbent retuning charges such that the Commission has not had to initiate any LOC draw downs.³

On two earlier occasions, first in early 2009⁴ and subsequently in May 2010⁵, Sprint worked with the LOC Issuing Banks to extend the term of the original LOC to October 2013, consistent with the duration of Sprint's then-existing credit facility. While significant progress continues to be made in completing 800 MHz reconfiguration⁶, a number of large statewide, regional and U.S. – Canada systems have not completed their retunes and have requested additional time to complete their reconfiguration work. In addition, 800 MHz band reconfiguration in the U.S. – Mexico Border area has remained delayed pending renegotiation of a cross-border spectrum agreement between the U.S and Mexico and a Commission Report and Order initiating rebanding along the border. Because 800 MHz band reconfiguration will not be fully complete by October 2013, as part of the renegotiation of its overall revolving credit facility, Sprint Nextel has extended the LOC so that it is expected to cover the remaining term of the rebanding project.

The LOC continues to be held in escrow by JP Morgan Chase Bank, the Issuing Bank's administrative agent.⁷ The five Issuing Banks are unchanged.⁸

Sprint greatly appreciates the efforts of the Commission and its staff throughout this proceeding. Sprint remains committed to working cooperatively with the Commission, its staff, and all involved parties to implement 800 MHz band reconfiguration and improve public safety communications in the 800 MHz band.

³ Sprint has paid 800 MHz incumbent retuning costs as incurred; accordingly, the Commission has reduced the LOC requirement by \$1.641 billion – from \$2.5 billion to \$859 million, consistent with the provisions of the *R&O* and subsequent Commission decisions.

⁴ See Letter from James B. Goldstein, Director - Sprint Nextel Corporation to David Furth, Acting Bureau Chief, dated April 27, 2009, filed in WT Docket 02-55.

⁵ See Letter from James B. Goldstein, Director - Sprint Nextel Corporation to David Furth, Deputy Bureau Chief, dated May 27, 2010, filed in WT Docket 02-55.

⁶ See 800 MHz Monthly Report, dated March 1, 2013.

⁷ The full text of Sprint's Credit Agreement can be found at <http://www.sec.gov/Archives/edgar/data/101830/000010183013000008/exhibit1018-k20130228.htm>.

⁸ The five Issuing Banks are JP Morgan Chase, N.A., Citibank, N.A., Bank of America, NA, Barclays Bank, PLC, and Wells Fargo. Aside from the new expiration date, the terms of the LOC are unchanged.

This letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ James B. Goldstein
James B. Goldstein
Senior Counsel

cc: Michael Wilhelm, PSHSB
800 MHz Transition Administrator