

VIA HAND DELIVERY

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

REDACTED – FOR PUBLIC INSPECTION

FILED/ACCEPTED

July 1, 2011

JUL - 1 2011

Re: WT Docket No. 11-18

Federal Communications Commission
Office of the Secretary

Dear Ms. Dortch:

QUALCOMM Incorporated (“QUALCOMM”), by its attorneys, hereby submits its second partial response (“Second Partial Response”) to the Federal Communications Commission’s (“FCC”) May 20, 2011, General Information Request Regarding the AT&T/QUALCOMM Transaction in the above-referenced proceeding (“Request”), pursuant to the First and Second Protective Orders (“Protective Orders”) entered in this proceeding.¹ This Second Partial Response supplements QUALCOMM’s Partial Response submitted on June 10, 2011 (“Partial Response”).

This Second Partial Response reflects communications QUALCOMM had with FCC staff concerning the manner in which QUALCOMM proposed to reply to the Request. These communications concerned QUALCOMM’s understanding of the questions, definitions, and instructions in the Request, the manner in which QUALCOMM keeps the data requested, and the manner in which QUALCOMM searched for and produced this data. These discussions related to and are reflected in the documents provided in this Second Partial Response.

QUALCOMM has taken reasonable efforts to search for, identify, and produce documents and information responsive to the Request and to otherwise respond to the Request consistent with the breadth of the Request and the period of time provided for response. The documents provided in this Second Partial Response are those maintained in the ordinary course of QUALCOMM’s business. The documents provided in this Second Partial Response were collected using the process described in CONFIDENTIAL Exhibit 1 and CONFIDENTIAL Attachments A and B to Exhibit 1.

¹ *Applications of AT&T Mobility Spectrum LLC and Qualcomm Inc. for Consent to the Assignment of Lower 700 MHz Band Licenses*, WT Docket No. 11-18, Protective Order, DA 11-806 (rel. May 20, 2011); *Applications of AT&T Mobility Spectrum LLC and Qualcomm Inc. for Consent to the Assignment of Lower 700 MHz Band Licenses*, WT Docket No. 11-18, Second Protective Order (Revised), DA 11-1098 (rel. Jun. 22, 2011).

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This Second Partial Response includes:

1. One HIGHLY CONFIDENTIAL hard drive, which contains HIGHLY CONFIDENTIAL, CONFIDENTIAL, and REDACTED – FOR PUBLIC INSPECTION documents, under seal;
2. One CONFIDENTIAL DVD-ROM, which contains CONFIDENTIAL and REDACTED – FOR PUBLIC INSPECTION documents, under seal;
3. A second CONFIDENTIAL DVD-ROM, which contains a document index in Excel format, which includes ten tabs that group the documents according to the Request(s) to which they are responsive. Within each tab, the documents are organized by custodian; and
4. Two copies of a REDACTED – FOR PUBLIC INSPECTION DVD-ROM, which contains REDACTED – FOR PUBLIC INSPECTION documents.

Pursuant to the Protective Orders:

1. HIGHLY CONFIDENTIAL information is marked, “*HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 11-18 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING PROHIBITED*”;
2. CONFIDENTIAL information is marked, “*CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 11-18 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING PROHIBITED*”; and
3. REDACTED – FOR PUBLIC INSPECTION information is marked, “REDACTED – FOR PUBLIC INSPECTION”.

Pursuant to the Request, QUALCOMM is providing electronic copies of certain documents in native format. Because QUALCOMM is unable to mark each page of those documents as CONFIDENTIAL or HIGHLY CONFIDENTIAL without altering them, QUALCOMM has included the CONFIDENTIAL and HIGHLY CONFIDENTIAL language described immediately above as part of all native format file names, in addition to their assigned Bates numbers.

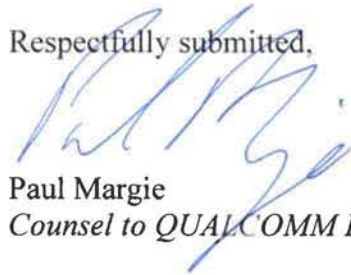
Finally, pursuant to the Protective Orders, QUALCOMM is also submitting two copies of the HIGHLY CONFIDENTIAL and CONFIDENTIAL versions of this Second Partial Response to Kathy Harris of the Wireless Telecommunications Bureau by hand delivery.

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QUALCOMM requests the return of all HIGHLY CONFIDENTIAL and CONFIDENTIAL information at the conclusion of this proceeding. A password/encryption key for the CONFIDENTIAL and HIGHLY CONFIDENTIAL electronically submitted information is being transmitted by separate email.

Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,



Paul Margie
Counsel to QUALCOMM Incorporated

Enclosures

REDACTED – FOR PUBLIC INSPECTION

Exhibit 1

**Qualcomm has designated 3 pages of Exhibit 1 as
CONFIDENTIAL Information**

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Attachment A

**Qualcomm has designated 2 pages of Attachment A as
CONFIDENTIAL Information**

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Attachment B

**Qualcomm has designated 21 pages of Attachment B as
CONFIDENTIAL Information**

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**Qualcomm has designated 713 pages of a Production
Index as CONFIDENTIAL Information**

DOCKET NO.

1718

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o This document is confidential (**NOT FOR PUBLIC INSPECTION**)

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

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