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August 29, 2011

**VIA HAND DELIVERY AND ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth St, S.W.  
Washington, D.C. 20554

Re: Applications of AT&T Inc. (“AT&T”) and Deutsche Telekom AG (“Deutsche Telekom”) for Consent To Transfer Control of the Licenses and Authorizations Held by T-Mobile USA, Inc. and Its Subsidiaries (“T-Mobile USA”), WT Docket No. 11-65

Dear Ms. Dortch:

Deutsche Telekom and T-Mobile USA herewith submit some clarifications regarding the data previously provided to the FCC in their submissions of June 10, 2011; June 14, 2011; June 24, 2011; and July 7, 2011.<sup>1</sup> These clarifications are provided in response to questions by the FCC staff.

**Billing Data.**

*1. Could you provide plan characteristics for all legacy plans included in the billing subscriber data?* In the Parties’ original June 10 submission to the FCC, the Billing Plans table only included those plans that were current in the relevant period, thus inadvertently leaving out plans that had expired but were still in use by subs in the relevant period. The Parties corrected this in the revised Billing Plans table submitted on June 24. While the “read me” file included with the June 24 table included the caveat that “there can be a record in the Billing\_Subs file . . . for which there is not a corresponding record in the Billing\_Plans file,” all plans in the Billing Subs table in fact are accounted for in the revised Billing Plans.

**Porting Data.**

*1. Is there any difference between missing values and zeros in the porting data?* No, missing values should be the same as zero entries.

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<sup>1</sup> See Letters from Deutsche Telekom and T-Mobile USA, WT Docket No. 11-65, dated June 10, 2011; June 14, 2011; June 24, 2011; and July 7, 2011 (“DT/TMUS Data”).

REDACTED—FOR PUBLIC INSPECTION

August 29, 2011  
Page 2

**Handsets.**

- 1. Approximately what percentage of total handset sales are included in the handset data?* Approximately [Begin Confidential Information] [End Confidential Information] of total handset sales are included in the handset data.
- 2. Handsets. Are internet handset sales included in the data and if not, is this data available?* No, internet handset sales are not included. T-Mobile USA is researching the availability of internet handset sales data and will provide a follow up.
- 3. Handsets. Does T-Mobile USA maintain a database of handset characteristics that could be merged with the handset data (e.g. OS type, features etc.)? Would it be possible to also provide the FCC ID that is submitted for Hearing Aid Compatibility?* T-Mobile USA is attempting to merge data to provide additional information and will provide a follow up.

**Network Quality.**

- 1. Does T-Mobile USA have signal strength (dBm) data by CMA as provided by ATT in their economic model filing? (e.g. % of CMA with Best Signal Level (dBm) >=-56)?* T-Mobile USA does not keep such data in the ordinary course of business. T-Mobile USA can generate contour maps at any requested signal level and provide coverage data, although such analysis will take time.

**CMA Subscriber Data.**

- 1. What handset sales are included in the equipment revenue figures? Does this only include sales in owned and operated stores as provided in the handset data?* In the CMA Subscriber Data table, the rev\_equip field does not include handset sales data. Instead, that table contains charges to subscribers related to equipment, as recorded in Samson, including new handsets, handset upgrades, and equipment restocking fees. It does not include equipment purchased in stores.
- 2. Are subsidies included in the equipment revenues (revenues are never negative)?* Subsidies are included and are typically smaller for low cost phones. [Begin Confidential Information]

REDACTED—FOR PUBLIC INSPECTION

August 29, 2011  
Page 3

[End Confidential Information]

3. *What is included in the rev\_other variable?* [Begin Confidential Information]

[End Confidential Information]

4. *Retentions were supposed to be customers that called to disconnect but were “saved” through offers by T-Mobile USA customer service agents. Is this data kept?* The FCC request was for “the number of saves/retention in the CMA in the given month.” TMUS initially responded by providing the number of contract extensions as that is the metric closest to what the initial request was understood to be seeking. T-Mobile USA is researching the availability of other data on customers “saved” and will provide a follow-up response.

5. *ARPU sometimes [Begin Confidential Information] [End Confidential Information] with a significant number of subs in CMA, how can ARPU be so high?* [Begin Confidential Information]

[End Confidential Information]

6. *ARPU is sometimes negative although all reported revenues and subscribers are positive, is this due to writeoffs and adjustments? What are included in these adjustment factors and could this data be provided?* [Begin Confidential Information]

[End Confidential Information]

**Bidding Data.**

1. *Can contract value and/or bid amount be provided?* [Begin Confidential Information]

August 29, 2011  
Page 4

[End Confidential

**Information]**

2. *We have missing values in the “total lines” field, close to 200 of the 576 observations. Is there any way that additional data could be provided for this field, esp. if contract value cannot be provided?* T-Mobile USA has been able to complete 39 more entries in the Total Lines column and 26 more entries in the Monthly Total Revenue column – a revised file is attached. All available data has been included.

3. *There appear to be inconsistencies in the “Number of Bidder” field versus those service providers which submitted a bid. Could you explain how these data were constructed/entered?* TMUS has corrected the inconsistencies in the revised table attached hereto. There is one case (project ID “2011021”) in which the total number of bidders reported in the “No\_Bidders” field exceeds the number of individual bidders identified (ATT\_Bid, VZ\_Bid, TM\_Bid, and Sprint\_Bid fields). In that case, the other bidder was US Cellular.

**Roaming Data.**

1. *Can roaming traffic and revenues be separated for voice (2G and 3G), SMS, and data (2G and 3G)?* T-Mobile USA will provide “inbound” roaming (i.e., roaming by other carriers’ subscribers on T-Mobile USA’s network) broken down by partner, BID region, service, and 2G vs. 3G in a follow-up response. While T-Mobile USA does have a breakdown of actual usage between 2G and 3G, T-Mobile USA does not settle or bill separately for 2G and 3G. As such, the revenue provided will be an allocation in accordance with T-Mobile USA ordinary course of business practices, not actual charges.

2. *Is T-Mobile USA’s roaming traffic and purchase information to its roaming partners (e.g. TMO’s voice, sms, data traffic roamed on its partner networks, and T-Mobile USA’s payment to its roaming partners) available by month and separated by 2G/3G?* T-Mobile USA cannot breakdown “outbound” roaming (i.e., roaming by T-Mobile USA subscribers on other carriers’ networks) between 2G and 3G. T-Mobile USA will provide outbound roaming by partner, BID region, and service in a follow-up response.

REDACTED—FOR PUBLIC INSPECTION

August 29, 2011  
Page 5

3. *Can roaming traffic and revenues be identified or separated by domestic and international partners and then by voice/data, SMS, and 2G/3G?* T-Mobile USA will provide inbound roaming data for international partners broken down by partner, BID region, service, and 2G vs. 3G in a follow-up response. As with domestic partners, T-Mobile USA does not bill or settle separately for 2G and 3G with its international partners, so the revenue provided will be an allocation.

4. *Are separate roaming traffic and revenue balance tables for 2G voice, 2G data, SMS, 3G voice, and 3G data available by month?* No, because T-Mobile USA cannot break down outbound roaming between 2G and 3G, such balances cannot be calculated.

5. *Does T-Mobile USA charge different roaming rates for different roaming locations (e.g. one rate for roaming in NYC and one rate for roaming in LA) for the same roaming partner?* [Begin Confidential Information]

[End

Confidential Information]

Pursuant to the terms of the Second Protective Order, two public versions of this letter, without data disks, have been filed with the Office of the Secretary. In addition, two copies of the Highly Confidential version of this letter, including the data disks, have been submitted to Ms. Katherine Harris of the Wireless Communications Bureau's Mobility Division. A copy of the redacted public



**REDACTED—FOR PUBLIC INSPECTION**

August 29, 2011  
Page 6

version of this letter will also be filed electronically through the Commission's Electronic Comment Filing System. Should any questions arise concerning this response, please do not hesitate to contact the undersigned immediately.

Respectfully submitted,

/s/ Eric W. DeSilva

Eric W. DeSilva

cc: Katherine Harris ([katherine.harris@fcc.gov](mailto:katherine.harris@fcc.gov))  
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