

August 26, 2011

FILED/ACCEPTED

AUG 26 2011

Federal Communications Commission
Office of the Secretary

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *In the Matter of Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Transfer Control of Licenses and Authorizations Held by T-Mobile USA, Inc. and Its Subsidiaries (WT Dkt. No. 11-65)*

REDACTED FOR PUBLIC INSPECTION

Dear Ms. Dortch:

On behalf of AT&T Inc., and pursuant to the Protective Order and the Second Protective Order adopted in the above-referenced proceeding,¹ the instructions set forth in the Information and Discovery Request dated May 27, 2011 ("Request"), and the Supplemental Request for Information dated June 27, 2011 ("Supplemental Request"), enclosed please find two public copies of the Seventh Supplemental Response providing further information sought by the Commission with respect to Request 50.

We are providing under separate cover the Highly Confidential version of this Seventh Supplemental Response and Highly Confidential Exhibits to the Seventh Supplemental Response.

Copies of the enclosed are also being hand delivered to Kathy Harris of the Wireless Telecommunications Bureau.

¹ In re Applications of AT&T Inc. and Deutsche Telekom AG Inc. for Consent to Transfer Control of the Licenses and Authorizations, WT Dkt. No. 11-65, Protective Order, DA 11-674 (WTB rel. Apr. 14, 2011) ("Protective Order"); In re Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations, WT Dkt. No. 11-65, Second Protective Order, DA 11-753 (WTB rel. Apr. 27, 2011), as revised June 9, 2011 and July 19, 2011 ("Second Protective Order").

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Please contact me if you have any questions. Thank you for your assistance.

Sincerely,



David R. McAtee II
Counsel for AT&T Inc.

Enclosures

cc: Nicholas Even (Firm)
Peter J. Schildkraut, Arnold & Porter, LLP
Kathy Harris (by email) (by hand, with enclosures)
Kate Matraves (by email)
Jim Bird (by email)

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

AUG 26 2011

Federal Communications Commission
Office of the Secretary

In the Matter of)

Applications of AT&T Inc. and)
Deutsche Telekom AG Inc. for)

Consent to Transfer Control of the Licenses and)
Authorizations held by T-Mobile USA, Inc. and)
Its Subsidiaries)

WT Docket No. 11-65

SEVENTH SUPPLEMENTAL RESPONSE OF AT&T INC.
TO INFORMATION AND DISCOVERY REQUEST DATED MAY 27, 2011
AND TO SUPPLEMENTAL REQUEST FOR INFORMATION DATED JUNE 27, 2011

August 26, 2011

**SEVENTH SUPPLEMENTAL RESPONSE OF AT&T INC.
TO INFORMATION AND DISCOVERY REQUEST DATED MAY 27, 2011
AND TO SUPPLEMENTAL REQUEST FOR INFORMATION DATED JUNE 27, 2011**

August 26, 2011

Introduction

AT&T Inc. (“AT&T”) provides this seventh supplemental response (the “Seventh Supplemental Response”) to the letter dated May 27, 2011, from Ruth Milkman, then Chief of the Wireless Telecommunications Bureau of the Federal Communications Commission (the “FCC” or the “Commission”), and the attached Information and Discovery Request for AT&T, Inc. (collectively, the “Request”), and to the Supplemental Request for Information dated June 27, 2011, from Rick Kaplan, current Chief of the Wireless Telecommunications Bureau of the FCC (the “Supplemental Request”).

AT&T (sometimes referred to in the Request as the “Company” as defined therein) incorporates by reference additional information from its June 10, 2011 Response (“Response”), July 7, 2011 Supplemental Response (“Supplemental Response”), July 19, 2011 Second Supplemental Response (“Second Supplemental Response”), July 27, 2011 Third Supplemental Response (“Third Supplemental Response”), August 9, 2011 Fourth Supplemental Response (“Fourth Supplemental Response”), August 19, 2011 Fifth Supplemental Response (“Fifth Supplemental Response”), and August 25, 2011 Sixth Supplemental Response (“Sixth Supplemental Response”) including the defined terms, information and qualifications included therein.

Where a request seeks charts, spreadsheets or similar graphic or tabular information, or specific documents, responsive information is provided in exhibits to the Seventh Supplemental Response, numbered with reference to the specific request (e.g., Exhibit 50-16 provides

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supplemental information responsive to Request No. 50). A Seventh Supplemental Index of Exhibits is appended as Exhibit B.7.

The Request and Supplemental Request call for AT&T to submit certain information and documents that are extremely sensitive from a commercial, competitive, and financial perspective, and that AT&T would not reveal in the ordinary course of business to the public or its competitors. AT&T is submitting information and documents on a confidential and highly confidential basis pursuant to the Protective Order issued on April 14, 2011, and the Second Protective Order, issued on April 27, 2011, and amended on June 9, 2011 and July 19, 2011, in place in WT Docket No. 11-65. The inadvertent inclusion of any material that is subject to an assertion of the attorney-client, attorney work-product or other applicable privilege is not intended as a waiver of such privilege.

AT&T has redacted confidential information in the Seventh Supplemental Response (as reflected where marked “[**Begin Confidential Information**] [] [**End Confidential Information**]”) and highly confidential information in, and exhibits to, the Seventh Supplemental Response (as reflected where marked “[**Begin Highly Confidential Information**] [] [**End Highly Confidential Information**]”). The redacted Seventh Supplemental Response is marked, “**REDACTED – FOR PUBLIC INSPECTION,**” and is being filed electronically in the Commission’s Electronic Comment Filing System (“ECFS”). The highly confidential, unredacted Seventh Supplemental Response is marked, “**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 11-65 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING PROHIBITED,**” and is being delivered to the Secretary. Additional copies of the unredacted Seventh Supplemental Response are being delivered as instructed in the original

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Request.

In accordance with the Request, the Supplemental Request, the Protective Order, and the Second Protective Order, as amended, unredacted copies of highly confidential documents are marked "**HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 11-65 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION - ADDITIONAL COPYING PROHIBITED**"; unredacted copies of confidential documents are marked "**CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 11-65 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**"; and redacted copies of highly confidential and confidential documents are marked "**REDACTED - FOR PUBLIC INSPECTION.**" Pursuant to the Request and Supplemental Request, both the redacted and unredacted versions of confidential and highly confidential documents are being delivered to Kathy Harris of the Wireless Telecommunications Bureau.

RESPONSES

50. REQUEST:

Provide data for the Company's spectrum holdings, responses to customers' requests for proposals (RFP's), number of subscribers, retail locations, handsets, and network quality, as specified in Attachment C.

RESPONSE:

Network Quality

The Commission has asked AT&T to provide signal strength data (dBm) by CMA and month. **[Begin Highly Confidential Information]**

¹ [Begin Highly Confidential Information]

[End Highly

Confidential Information]

² [Begin Highly Confidential Information]

[End Highly Confidential Information]

³ [Begin Highly Confidential Information]

[End Highly Confidential Information]

⁴ [Begin Highly Confidential Information]

[End Highly Confidential

Information]

⁵ [Begin Highly Confidential Information]

[End Highly Confidential

Information]

[End Highly Confidential Information]

Handsets

In response to Staff's supplemental request for data on handsets, AT&T responds as follows:

⁶ **[Begin Highly Confidential Information]**

[End Highly Confidential Information]

⁷ **[Begin Highly Confidential Information]**

[End Highly Confidential Information]

1: Please provide the current mix of busy hour traffic in each market:

- a. Total market voice erlangs full rate vocoder**
- b. Total market voice erlangs half rate vocoder**
- c. Total market R99 data**
 - i. Downlink**
 - ii. Uplink**
- d. Total market HSPA data**
 - i. Downlink**
 - ii. Uplink**

Information responsive to this request is provided in Highly Confidential Handset Exhibit 50-20. **[Begin Highly Confidential Information]**

[End Highly

Confidential Information]

2: Please provide the current mix of handsets by vocoder capability in each market:

- a. Full rate handsets**
- b. Half rate handsets**

Information responsive to this request is provided in Highly Confidential Handset Exhibit 50-21. **[Begin Highly Confidential Information]**

[End Highly Confidential Information]

3: Please provide the current mix of handsets by data capability in each market:

- a. No data (voice only handsets)
- b. EDGE-only data capability
- c. R99 data capability (we assume all these can fall back to EDGE)
- d. HSPA data capability (we assume all these can fall back to EDGE or R99)

Information responsive to Request 3 is provided in Highly Confidential Handset Exhibit 50-23. **[Begin Highly Confidential Information]**

[End

Highly Confidential Information]

4: Please provide the relative intensity of busy hour data traffic per handset for each market for the following capabilities:

- a. EDGE**
- b. R99**
- c. HSPA**

AT&T does not maintain in the ordinary course of business data that permits it to show the relative intensity of busy hour data traffic per handset for each market based on whether the handset uses EDGE, R99 or HSPA technology. **[Begin Highly Confidential Information]**

[End Highly Confidential Information]

5: Please provide the forecasted mix of handsets in each market annually from 2011 through 2016

- a. Voice**
 - i. Full rate**
 - ii. Half rate**
- b. Data**
 - i. No data**
 - ii. EDGE**
 - iii. R99**
 - iv. HSPA (please split out forecast by various HSPA data rate classes)**

AT&T does not maintain in the ordinary course of business a forecast of the mix of handsets by either voice vocoder or data capability. **[Begin Highly Confidential Information]**

[End Highly Confidential

Information]

6: Forecast change in the intensity of data usage of each handset type in each market annually from 2011 through 2016:

- a. **No data (voice only handsets)**
- b. **EDGE-only data capability**
- c. **R99 data capability (we assume all these can fall back to EDGE)**
- d. **HSPA data capability (we assume all these can fall back to EDGE or R99)**

AT&T does not maintain in the ordinary course of business forecast data on the change in the intensity of data usage for each handset type by data capability. **[Begin Highly Confidential**

Information]

[End Highly Confidential

Information]