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October 14, 2011

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

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

Dear Ms. Dortch:

Verizon Wireless hereby submits its Highly Confidential supplemental response to the Information and Discovery Request for Third Parties issued by the Wireless Telecommunications Bureau in WT Docket No. 11-65 to Verizon Wireless on June 6, 2011,¹ as amended by letter dated June 27, 2011.² Verizon Wireless is providing a supplemental response to Items 8 and 9 today.

This response includes Highly Confidential Information that is some of Verizon Wireless' most sensitive business information, is not available from publicly available sources, has been kept strictly confidential by Verizon Wireless, and is subject to protection under FOIA and the Commission's implementing rules. The release of this Highly Confidential Information would have a serious negative effect on Verizon Wireless' business and would place Verizon Wireless at a significant disadvantage in the marketplace and in negotiations. Accordingly, Verizon Wireless is submitting this Highly Confidential Information pursuant to the Second Protective Order (Revised) issued June 22, 2011 ("Second Protective Order") in this docket and has marked this document as such.³

Verizon Wireless is providing comma-delimited ASCII text files with data on the Attachment A Billing_Subs table for postpaid subscribers for the period from January 2008

¹ See Letter from Ruth Milkman, FCC, to John T. Scott III, Verizon Wireless, WT Docket No. 11-65 (dated June 6, 2011).

² See Letter from Rick Kaplan, FCC, to John T. Scott III, Verizon Wireless, WT Docket No. 11-65 (dated June 27, 2011).

³ *Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 11-65, *Second Protective Order (Revised)*, DA 11-1100 (rel. June 22, 2011) ("Second Protective Order").

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through March 2011. The files are password protected, and the passwords are as follows: **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[END HIGHLY CONFIDENTIAL INFORMATION].

In addition, Verizon Wireless is also providing a single comma-delimited ASCII text file with data on the Billing_Subs table for prepaid subscribers for the same time period. The file is password protected, and the password is **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION].**

Verizon Wireless is also providing comma-delimited ASCII text files with data on the Attachment A Billing_Ports table for the period from 2008 through 2011. The files are password protected, and the password is **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION].**

Finally, Verizon Wireless is also providing pipe-delimited data files with data on the Attachment B Device Sales table for the period from January 2009 through September 2011. The files are password protected, and the password is **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION].**

This information is being produced under the Second Protective Order.

Please contact the undersigned if you have any questions.

Sincerely,



John T. Scott, III
Vice President & Deputy General Counsel

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