



C Spire Wireless
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Ridgeland, MS 39157

April 11, 2012

VIA ELECTRONIC MAIL AND U.S. MAIL

The Honorable Henry A. Waxman
Ranking Member
United States House of Representatives Committee on Energy & Commerce
2125 Rayburn House Office Building
Washington, DC 20515-6115

The Honorable Anna G. Eshoo
Ranking Member
United States House of Representatives Committee on Energy & Commerce,
Subcommittee on Communications & Technology
2125 Rayburn House Office Building
Washington, DC 20515-6115

The Honorable Edward J. Markey
Member of Congress
2108 Rayburn House Office Building
Washington, DC 20515

Dear Ranking Member Waxman, Ranking Member Eshoo, and Congressman Markey:

Thank you for your March 23, 2012, letter requesting information regarding the steps C Spire Wireless undertakes to deter and protect our customers against cell phone theft.

Please find our responses to your inquiries below. We trust you will find this information helpful as you examine policies to promote the interests of wireless consumers.

Q1: What company policies and guidelines do you currently have in place that relate to cellphone theft or loss?

At C Spire Wireless, the customer is at the center of everything we do. That is why we work closely with law enforcement whenever a customer notifies us of a lost or stolen wireless device. It is our policy to deactivate stolen devices and to otherwise cooperate with law enforcement efforts to deter cell phone thefts.

Specifically, when a device is reported lost or stolen by a C Spire Wireless customer, we take the following steps:

1. Check the account for fraudulent or unusual use;

2. At the customer's request, we suspend all service on the device, which blocks all voice, text and data use;
3. Maintain a block on the phone's use until the customer contacts C Spire and makes customer care aware that the device has been located, a replacement device has been activated, or the customer wishes to discontinue service for that account; and
4. If the lost or stolen device is replaced or the service is discontinued, the stolen device's ESN or IMEI code is placed on C Spire's lost/stolen file database which prevents it from being reactivated on the C Spire Wireless network.

Q2: Do you have an evaluation process to ensure that these policies keep up with advancing technologies and changing criminal tactics?

The technologies and services we provide our customers are ever-changing. That is why C Spire routinely evaluates our existing procedures to ensure that we are looking out for our customers' interests while providing the services they want, where they want them.

Q3: Law enforcement and others have suggested that the ability to disable remotely mobile devices would reduce or eliminate resale value and thus lessen the incentive for cell phone theft. What are your views on this technology as a deterrent to theft?

The ability to disable a stolen device is helpful to deterring theft. When a customer deactivates or replaces a stolen device, C Spire Wireless places the ESN or IMEI code of that stolen device in our lost/stolen file database – preventing the device from being reactivated on our network.

Q4: Does your company cooperate with law enforcement to retrieve lost or stolen phones? If so, how?

Yes. Please see our response to Q1, above.

Q5: If your company has knowledge that a specific phone has been reported stolen, do you allow such a phone to be subsequently reactivated with a different phone number? If yes, please explain.

No. Please see our response to Q1 and Q3, above.

Q6: Australia has implemented a cell phone "blacklisting" program in which phones that have been reported stolen are placed on a list and cannot be reactivated if an individual brings them in to a local carrier. This has significantly reduced cell phone theft in Australia. Would a similar program work in the United States?

While we are not familiar with the details of the Australian program referenced in the question, C Spire Wireless is always willing to cooperate and work with law enforcement officials regarding cell phone theft. It is an issue that we take seriously. C Spire Wireless would be willing to participate in discussions regarding the creation of a national database or listing of stolen cell phones. We have seen recent press reports regarding discussions among the four largest U.S. wireless carriers on the creation of a national database of stolen devices and we hope to learn more about this effort.

Q7: What more can be done to protect consumers? Please include any additional insights that you believe we might find helpful or relevant.

C Spire Wireless remains a vocal proponent of competition and innovation in the wireless industry. A competitive marketplace provides the best means of advancing wireless consumers' interests and wide-spread economic growth. Restoring competition in the wireless industry will provide consumers with greater choice and will force wireless operators to be more responsive to consumer demands for innovation, including better and more effective means of deterring cell phone theft. Therefore, we encourage Members of Congress to pursue policies that promote competition in the wireless industry through ensuring reasonable access to spectrum, data roaming, and the interoperability of devices across each band of allocated spectrum.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben M. Moncrief". The signature is stylized and cursive.

Benjamin M. Moncrief
Director, Government Relations
C Spire Wireless