

REDACTED – FOR PUBLIC INSPECTION



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September 9, 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,<sup>1</sup> as amended by letter dated June 27, 2011.<sup>2</sup> Verizon Wireless is providing a supplemental response to Items 2 and 6 and a partial response to Items 8 and 9 today pursuant to prior discussions with Bureau staff. Set forth below is the Company's response to each referenced request.

Certain of these responses include Confidential Information that is not otherwise available from publicly available sources and is subject to protection under FOIA and the Commission's implementing rules. Accordingly, Verizon Wireless is submitting this Confidential Information pursuant to the Protective Order issued April 14, 2011 ("First Protective Order") in this docket and has marked these documents as such.<sup>3</sup>

In addition, certain of these responses include 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

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

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

<sup>3</sup> *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, *Protective Order*, DA 11-674 (rel. June 22, 2011) ("First Protective Order").

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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 these documents as such.<sup>4</sup>

Because of the Highly Confidential nature of the responses, the documents are password protected. The user name to access the Highly Confidential documents is [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [END HIGHLY CONFIDENTIAL INFORMATION] and the password is [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [END HIGHLY CONFIDENTIAL INFORMATION].

**Requests 2 and 6.** Additional documents responsive to these requests are attached at VZW0001511 to VZW0001542. These documents are being produced under the Second Protective Order.

**Request 8.** Verizon Wireless is providing the Attachment A – Billing Ports table as an excel spreadsheet. [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL INFORMATION]

This information is being produced under the Second Protective Order.

**Request 9.** Verizon Wireless is providing the Attachment B – Bidding table as five spreadsheets (.csv). One spreadsheet identifies RFP responses on a national basis (HQ RFP) and the other four identify RFP responses in the four Verizon Wireless areas (Northeast, South, Midwest and West). [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL]

Verizon Wireless is providing the Attachment B – Network Quality table as requested.

Verizon Wireless is providing the Attachment B – Device Sales table as an excel spreadsheet. [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY CONFIDENTIAL INFORMATION] Pursuant to discussions with Staff, the device sales data is being provided pursuant to Verizon Wireless regional sales data.

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<sup>4</sup> *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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This information is being produced under the Second Protective Order.

To facilitate the FCC's review of this data, Verizon Wireless is producing a map depicting the four Verizon Wireless areas, 21 Verizon Wireless regions, and CMAs. This map is being produced under the First Protective Order.

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a horizontal line underneath the name.

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

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