

WT Docket Number 11-65
INFORMATION AND DISCOVERY REQUEST FOR AT&T INC.

1. The Applicants state that AT&T is facing network spectrum and capacity constraints “more severe” or “more serious” than those of any other wireless provider. (Public Interest Statement, pages 1 and 19). Provide all plans, analyses, and reports discussing the relative network spectrum capacity constraints of the Company and other mobile wireless service providers, including any relevant pricing, traffic and spectrum efficiency assumptions.
2. The Applicants state that AT&T faces growing capacity constraints in certain urban, suburban, and rural areas. (Public Interest Statement, pages 4-5 and 25-30). The Applicants also state that the Company anticipates that it would lack the spectrum it would need to serve the demand for UMTS service in some areas, that its spectrum constraints would keep the Company from launching and supporting UMTS services at all in other areas, and that these constraints “would prevent AT&T in some markets from deploying LTE at all, from providing LTE in its most beneficial configuration and/or from serving expected LTE demand.” (Public Interest Statement, pages 28-30). Provide all documents relied upon in making these statements, and all documents reviewed or relied upon by Mr. Hogg in making the statements cited at pages 25-30 of the Public Interest Statement.
3. Provide all plans, analyses, and reports discussing: (a) the definition or determination of what constitutes a capacity or spectrum constraint, including the factors involved in making that determination in any relevant area (*e.g.*, types of products and services offered and resulting demand; cost of additional capacity); and (b) potential resolutions of any constraint (including changes in price or actions to increase spectrum or spectral efficiency), and the implications on profitability or revenue of either the constraint or the resolution of the constraint.
4. Provide all plans, analyses, and reports discussing:
 - a. alternatives the Company considered to solve any constraints in capacity or to increase capacity to provide any relevant service in any relevant area, including:
 - i. acquiring new spectrum;
 - ii. plans to increase network capacity using existing spectrum, such as by adding cell sites or additional backhaul;
 - iii. repurposing spectrum, including the transition of subscribers from the repurposed spectrum; and
 - iv. alternative solutions to any spectrum constraint problems, including upgrading network or customer equipment, or changing prices;
 - b. current, future, or past problems or difficulties in providing any relevant service in any relevant area, including discussions of:
 - i. spectrum utilization and efficiency;
 - ii. any spectrum capacity constraints the Company is currently facing or the Company is projected to face in the future; and
 - iii. how the Company evaluates and monitors capacity and capacity utilization, including the amount of spectrum, speed of connection, and facilities (including cell site configuration and backhaul) that are required to meet consumer demand; and
 - iv. dropped and/or blocked calls and speed and other quality measures of data services;
 - c. communications given by the Company to investors, investor analysts, industry analysts, bankers, or financial regulators regarding the impact of any constraints on the Company’s expected performance, and provide any such communications given since

January 1, 2009.

5. The Applicants state that the Proposed Transaction would result in the “more efficient use of ‘spare’ capacity in areas where one or both companies’ networks are underutilized, driving improvements in both performance and capacity in those areas.” (Public Interest Statement, page 8; *see also* pages 39-42; Hogg Declaration, ¶¶ 54-55).
 - a. Define “spare” and “underutilized.”
 - b. Provide a list of all relevant areas where “one or both companies’ networks are underutilized.”
 - c. Provide all plans, analyses, and reports discussing:
 - i. the Company’s plans where the Company has underutilized networks;
 - ii. the Company’s use or possible use of WCS spectrum; and
 - iii. the Company’s conversion of its operations in the 1900 MHz spectrum band to the 850 MHz spectrum band; or
 - iv. the Company’s strategy with respect to obtaining or using spectrum below and/or above 1 GHz.
6. For any relevant service or any relevant product in any relevant area, provide all:
 - a. strategic and business plans;
 - b. other plans to reduce costs, improve services or products, improve service quality, improve capacity to transmit mobile wireless services, introduce new services or products;
 - c. budgets and financial projections on a multistate, regional or national basis; and
 - d. presentations to management committees, executive committees, boards of directors, investors, investor analysts, bankers and industry analysts.
7. Provide all plans, analyses, and reports discussing the Proposed Transaction (except those discussing solely environmental, tax, human resources, OSHA, or ERISA issues), including:
 - a. all plans for changes in AT&T’s and T-Mobile USA’s operations, structure, policies, strategies, product offerings, corporate goals, financing, business, officers, employees or any other area of corporate activity as a result of the Proposed Transaction;
 - b. any other terms or conditions of the Proposed Transaction that were considered but are not reflected in the merger agreement between the parties or in the other documents supplied in response to this Request;
 - c. all terms and conditions were the Proposed Transaction not to be consummated; and
 - d. the “break-up fee,” including how it was determined, and including presentations regarding the “break-up fee” to investors, investor analysts, industry analysts, bankers, or financial regulators.Also provide:
 - e. a timetable for the Proposed Transaction, including when it was first proposed and the actions that must be taken prior to consummation; and
 - f. to the extent not already provided, all agreements and similar documents relating to the Proposed Transaction, including all attachments, appendices, schedules, side or separate letter agreements to the Stock Purchase Agreement by and between Deutsche Telekom AG and AT&T Inc., and all similar documents by and among the Applicants, their Subsidiaries, Affiliates, or any subset thereof.
8. For any relevant service or any relevant product in any relevant area, provide all plans, analyses, and reports (including Nielsen reports and National Service Assurance reports) discussing:
 - a. buyer substitution responses to price or product changes (quantitatively or qualitatively), including all analyses of elasticities of demand (own-price elasticities

- and cross-price elasticities with respect to competitors, and the elasticity of demand in the industry as a whole (aggregate elasticity of demand));
- b. churn and subscriber acquisition and retention, including:
 - i. churn data, including the correlation of churn with quality, length of contract commitments, national footprint, price, the expected impact of migration to new technologies such as LTE, on churn, and any other factors;
 - ii. data or studies indicating that a customer left or switched to the Company because of pricing, network quality, customer service, or the absence or availability of particular services or devices (including figures on subscribers lost or gained), and any consumer surveys undertaken about consumer substitution across mobile wireless service providers;
 - iii. any attempts to win customers from or stem losses to other mobile wireless service providers;
 - iv. the Company's experience or success in retaining customers;
 - v. the Company's experience or success in obtaining customers through marketing or promotions targeted at particular mobile wireless service providers, particular geographic areas, particular wireless devices or types of customers (including the offers made and the amount spent on the marketing effort, the number of new subscribers gained, churn rates for such subscribers, and revenue realized by the Company);
 - vi. customer acquisition costs, including per gross addition costs; and
 - vii. descriptions or analyses of bidding results for enterprise or other large customers.
 - c. share of sales or revenues of the Company or any of its competitors, including subscriber counts, gross additions, deactivations, and net additions; and
 - d. share of sales through various distribution channels (*e.g.* own sales versus sales through exclusive or non-exclusive third parties) of the Company (by channel and by name for each third party) and its competitors.
9. For any relevant service or any relevant product in any relevant area, provide all plans, analyses, and reports discussing:
- a. any plans of, interest in, or efforts undertaken by the Company for any acquisition, divestiture, joint venture, alliance, or merger of any kind involving the provision or sale of any relevant product, or any relevant service, other than the Proposed Transaction;
 - b. any plans of, interest in, or efforts undertaken by the Company or its competitors to acquire spectrum;
 - c. any plans of, interest in, or efforts undertaken by the Company's competitors for any acquisition, divestiture, joint venture, alliance, or merger of any kind involving the provision or sale of any relevant product, or any relevant service, other than the Proposed Transaction;
 - d. the Company's analysis of, or response to, entry or potential competition;
 - e. any actual or potential effect on the supply, demand, cost, or price of any relevant service or any relevant product as a result of the introduction by a current competitor of any new pricing plan, relevant product or any relevant service; or
 - f. any actual or potential effect on the supply, demand, cost, or price of any relevant service or any relevant product as a result of competition from any new entrant or new service (such as Wi-Fi, WiMax, VoIP, or internet access service) regarded by customers as a potential substitute.
10. For any relevant service or any relevant product in any relevant area, provide all plans, analyses, and reports discussing:

- a. competitive positioning of the Company and other mobile wireless service providers (*e.g.*, price and quality relative to others), or how reliability and reputation affect competition or potential competition; or
 - b. how consumers or business customers or competitors view or perceive mobile wireless services or products offered by the Company or other mobile wireless service providers (including their perceptions of customer service, network quality, offering services at a particular rate, the impact of not offering particular wireless services or devices, the impact of pricing on decisions to take any relevant service or any relevant product, variation in subscribers' usage patterns across different pricing plans and devices, roaming, and the ability to use products internationally).
11. Provide the Company's and any competitor's price lists. Provide all plans, analyses, and reports discussing either the Company's or any competitor's pricing decisions, including: (a) pricing plans; (b) pricing policies; (c) pricing forecasts; (d) pricing strategies; (e) pricing analyses; (f) introduction of new pricing plans or promotions, including local promotions and their determinants and expected or actual impact; (g) tiered pricing, including its relationship to data forecasts and profitability and expected or actual impact; and (h) pricing decisions relating to each relevant service and relevant product.
12. Provide all merger simulations, econometric modeling, or similar analyses that have been undertaken by the Company or any consultant or expert hired by the Company to analyze the effect of the Proposed Transaction, including all documents and data used in these analyses.
13. For any relevant service or any relevant product, in any relevant area, provide all plans, analyses, and reports discussing:
 - a. the Company's advertising in any relevant area, or for any national, local, urban, suburban, or rural areas as defined by the Company;
 - b. plans for targeting particular competitors, customers, or customer segments;
 - c. plans for changes in the Company's marketing or advertising efforts as a result of the Proposed Transaction;
 - d. whether the T-Mobile USA brand will be continued if the Proposed Transaction were to be consummated, and if so, for how long,
 - e. whether, to what extent, and under what conditions will T-Mobile USA's current price plans be offered; or
 - f. the advertising and marketing efforts of the Company's competitors.
14. Provide all plans, analyses, and reports from January 1, 2007, to the present, discussing the research and development of any new relevant product by the Company, individually or with vendors, including those discussing the Company's total expenditures associated with research, development and testing of new relevant products.
15. Provide all documents discussing the cost and relative valuation of different spectrum licenses the Company considered acquiring or acquired in the secondary market, including through the acquisition of firms (other than T-Mobile USA).
16. Provide all plans, analyses, and reports discussing competition in the provision of any relevant service or any relevant product in any relevant area with respect to the Company's or any of its competitors analyses on standard setting for technologies relating to 700 MHz spectrum, including LTE and LTE devices and equipment.
17. Provide all plans, analyses, and reports discussing the extent to which customers may substitute

mobile wireless broadband services for wired broadband services and sales or marketing efforts that reflect such potential substitution.

18. Provide a list, as of the date of this Request, by CMA, of the cell sites owned or shared by the Company, the percentage of cell sites collocated each with the other Applicant, Sprint Nextel, Verizon Wireless, Leap, MetroPCS, US Cellular, and all other mobile wireless service providers.
19. Provide, by CMA, current and projected uplink and downlink data usage by the Company's current and projected customer base and the corresponding technologies and services currently used or projected to be used through 2014. Provide separate projections for: (a) the Company; and (b) for AT&T assuming the pending transaction to acquire Qualcomm's licenses is approved and consummated. Describe the pricing and spectrum efficiency assumptions used in making these projections.
20. Provide a list, in csv format, as of the date of this Request, for each county within each state, the District of Columbia, and each municipality within Puerto Rico, of each spectrum license that can be used in the provision of mobile wireless services that the Company holds, has a joint venture or other business arrangement with regard to, leases from another person, has another interest in, manages, has contracted to acquire, or is in negotiations to acquire. For each license, identify the: (a) FIPS Code; (b) county (or the District of Columbia, or municipality in the case of Puerto Rico); (c) state (including the District Columbia and Puerto Rico); (d) market name; (e) market number (in the case of CMA, MTA, or BTA); (f) spectrum type; (g) spectrum block; (h) amount of spectrum; (i) the wireless technology format deployed (*e.g.*, GSM, EDGE, UMTS, HSPA, HSPA+, LTE); and (j) whether the company: (i) holds; (ii) has a joint venture or other business arrangement with regard to; (iii) leases to or from another person; (iv) has an interest in; (v) manages; (vi) has contracted to acquire; (vii) is in negotiations to acquire; or (viii) plans to sell.
21. Provide, as of the date of this Request, maps by bands of the geographic coverage of each relevant service provided by the Company, distinguishing by technological format (*e.g.*, GSM, EDGE, UMTS, HSPA, HSPA+, and LTE, CDMA, EV-DO, EV-DO Rev. A). Provide coverage maps for a -95 and -85 dBm signal level or better for each of the relevant services provided by the Company. Provide the maps in a geo-referenced format, such as a shapefile (for ArcMap) or table (for Mapinfo).
22. Provide all plans, analyses, and reports discussing the current and projected performance characteristics of HSPA+ and LTE, including the efficiency of spectrum use, upload and download speed, latency, and deployment configuration.
23. Provide all agreements in effect between the Company and Verizon Wireless (Cellco Partnership d/b/a Verizon Wireless) and/or Verizon Communications Inc., as of the date of this Request, in which either has any preferential rights, including rights of first refusal or lower rates, on collocation on or backhaul provided by the other to cell towers located in the other's wireline footprint.
24. Provide all plans, analyses, and reports discussing, if the Proposed Transaction were to occur: (a) where there will be overlaps in coverage; (b) where and when existing cell sites will be consolidated and the criteria to be used to consolidate cell sites; or (c) the number of cell sites that the Merged Company will own, share, or decommission.
25. Provide all plans, analyses, and reports discussing any possible modification by the Merged Company of the terms, including prices, for providing backhaul for unaffiliated mobile wireless service providers to new or existing towers.

26. The Applicants state that the Proposed Transaction is “projected to produce operational savings and other cost synergies exceeding \$39 billion, with annual savings of approximately \$3 billion starting in year three.” (Public Interest Statement, page 9, *see also* pages 51-53). Rick Moore, in his declaration, discusses the “cost savings that will result from combining and optimizing customer support functions, including call center and billing operations.” (Moore Declaration ¶¶ 32, 37).
- a. Provide all documents supporting the estimates of operational savings and other cost synergies referred to above.
 - b. Provide all documents reviewed or relied upon by Mr. Moore in making the statements contained in Section V of his declaration.
 - c. For each operational savings or cost synergy identified by the Applicants in determining their total savings and annual savings referred to in the Public Interest Statement and the supporting declarations, (i) provide a quantification of the operational savings or cost synergy and an explanation of how the quantification was calculated; and (ii) state the steps that the Company anticipates taking to achieve that operational savings or cost synergy, and the estimated time and costs required to achieve it.
 - d. For each cost savings, state separately the one-time fixed cost savings, recurring fixed cost savings, and variable cost savings (in dollars per subscriber and dollars per year).
 - e. Provide all plans, analyses, and reports discussing how the Merged Company will integrate networks, switching facilities, cell sites and backhaul.
 - f. Provide all other strategic plans, policies, analyses, reports and presentations discussing expected cost savings from the Proposed Transaction.
27. The Applicants state that “AT&T cannot deploy LTE with the contiguous 20 MHz of spectrum needed for improved speed and spectral efficiency” in certain markets. (Public Interest Statement, page 5). The Applicants also state that the spectrum redeployment resulting from the Proposed Transaction would “enable the combined company to offer LTE where neither company could have offered it separately.” And, that “[i]n other markets, the redeployment of T-Mobile USA’s spectrum to LTE will also help prevent likely exhaustion of the LTE network as that service ramps up and demand inevitably increases.” (Public Interest Statement, page 40).
- a. Define 20 MHz of contiguous spectrum.
 - b. Provide all plans, analyses, and reports discussing the value of having 20 megahertz of contiguous spectrum, the ways in which such spectrum would be better for LTE deployment compared to any alternatives considered, or a measure of the additional benefits of having contiguous spectrum compared to any alternatives considered.
 - c. Provide a list of any relevant area by county where the Company does not possess sufficient spectrum to deploy LTE.
 - d. Provide a list of counties where AT&T proposes to deploy LTE, and identify for each county whether AT&T would hold less than 20 megahertz of contiguous spectrum or at least 20 megahertz of contiguous spectrum.
 - e. Provide a list of counties where the Merged Company proposes to deploy LTE, and identify for each county whether the Merged Company would hold less than 20 megahertz of contiguous spectrum or at least 20 megahertz of contiguous spectrum.
28. The Applicants state that the Proposed Transaction “will accelerate the transition to more spectrally efficient LTE technologies for more subscribers, thereby increasing network capacity and more efficiently using scarce spectrum resources.” (Public Interest Statement, pages 8-9; *see also* pages 40-42). Provide all plans, analyses, and reports discussing the potential effect of the proposed acquisition of T-Mobile USA’s spectrum licenses on the Merged Company’s deployment of LTE, including any discussions of the transition of subscribers from re-purposed spectrum and functional

equivalents to LTE that might be deployed to meet projected demand.

29. Provide all plans, analyses, and reports discussing: (a) spectrum requirements for all band segments; (b) the average data transmission speeds that the Company expects customers will be able to obtain; (c) actual and forecasted traffic and busy hour analyses, (d) total data tonnage; (e) capacity utilization rate; (f) vertically integrated operations; or (g) other technical or engineering factors required to attain any available cost savings or other efficiencies necessary to compete profitably in the sale or provision of any relevant product or any relevant service.
30. The Applicants state that the Proposed Transaction would enable the Merged Company to eliminate redundant control channels and promptly “free up 4.8 to 10 MHz of extra spectrum, depending on the market,” improving the quality of GSM service in congested areas or redeployed in the combined company’s UMTS network. (Public Interest Statement, pages 8, 36, citing Hogg Declaration, ¶48, Larsen Declaration ¶7). The Applicants also state that channel pooling efficiencies are “expected to increase GSM capacity by as much as 15 percent in some areas and, among other benefits, will reduce the number of blocked calls.” (Public Interest Statement, page 8; *see also* pages 37-39; Hogg Declaration, ¶¶ 50-53). Provide all plans, analyses, and reports discussing the effects of and the ability of the Merged Company to eliminate redundant control channels and achieve channel pooling efficiencies discussed in these statements. Provide all documents reviewed or relied upon by Mr. Hogg and Dr. Larsen in making the statements cited above. Provide all plans, analyses, and reports discussing how much control channel capacity is used to carry SMS text message traffic.
31. The Applicants state that AT&T has conducted a “more refined analysis” of the scope and capabilities for LTE expansion as a result of the Proposed Transaction, and state “the parties are thus now increasing the scope of this commitment to more than 97.3%.” (Public Interest Statement, page 10 n. 9). The Applicants also state that the Proposed Transaction will allow AT&T to increase its LTE deployment from 80 percent to more than 97 percent of the U.S. population, stating that “AT&T will provide LTE to approximately 55 million more people than under its current plans.” (Public Interest Statement, page 56).
 - a. Describe in detail, and provide all documents relied upon, how AT&T calculated that:
 - i. the Merged Company would be able to deploy LTE to more than 97.3% of the U.S. population referred to in footnote 9;
 - ii. that it currently is able to deploy LTE to 80 percent of the U.S. population; and
 - iii. that the Merged Company would be able to provide LTE to an additional 55 million people.
 - b. Provide a list of the counties where the Company does not provide wireless data service (or is able to provide wireless data service to only less than 5 percent of the county’s population) today (other than SMS and text messaging).
 - c. Provide all plans, analyses, and reports discussing:
 - i. the extent to which AT&T relies on carrier aggregation for the stated LTE deployment;
 - ii. how the Proposed Transaction would affect the provision of any relevant service and the deployment of LTE to Native Americans living on Tribal lands;
 - iii. how the Proposed Transaction will affect the provision of wireless data service in those counties that do not have any wireless data service today (other than SMS and text messaging);
 - iv. the need for LTE deployment compared to other means of meeting projected consumer demand; and

- v. expected LTE coverage of competitors, including Verizon Wireless.
32. William Hogg states in his declaration that “deployment of outdoor [distributed antenna system] networks and Wi-Fi hotspots. . . are high-cost and ultimately cannot achieve the same nationwide efficiencies as the merger.” Hogg Declaration, ¶ 73. Provide:
 - a. all plans, analyses, and reports examined in preparing this statement; and
 - b. in csv format, for each county within each state, the District of Columbia, and each municipality within Puerto Rico, on a yearly basis from January 1, 2007, the number each of total picocell, femtocell, and Wi-Fi hotspots within each county.
 33. To the extent not already provided, provide all plans, analyses, and reports (except engineering and architectural plans and blueprints) discussing the construction of new facilities (cell sites, aggregation points, switching centers, network operations centers, backhaul capacity, or any other physical location that houses hardware used by the network), the closing of any existing facilities, or the expansion, conversion, or modification of current facilities to provide any relevant product or any relevant service in any relevant area.
 34. Provide a list of each county within each state, the District of Columbia, and each municipality in Puerto Rico in which, as a result of the consummation of the Proposed Transaction, the Merged Company would no longer need roaming or wholesale agreements (from any other provider). Provide an estimate, and provide all supporting documents, of the yearly cost savings resulting from the reduction of the number of roaming agreements nationwide.
 35. Provide all plans, analyses, and reports discussing the possible effects of the Proposed Transaction on roaming or wholesale charges or discussing the Merged Company’s offering of roaming or wholesale arrangements.
 36. On page 54 of the Public Interest Statement, the Applicants state that the Proposed Transaction will create thousands of jobs. Provide all plans, analyses, and reports discussing the creation or loss of jobs if the Proposed Transaction were to be consummated.
 37. Provide a list, in csv format, of all exclusive relevant product agreements in force from January 1, 2004 to the present, including those that remain in effect and those that have already expired. For each agreement, provide (a) the name and/or model of the device, (b) the beginning and ending dates of the period of exclusivity; and (c) a summary of the other terms and conditions of the agreement, including any commitments with respect to: marketing the device; up-front discounts and subsidies; the pricing and duration of wireless service contracts; and policies on early termination fees.
 38. Provide all plans, analyses, and reports discussing the Company’s plans regarding future relevant product agreements.
 39. Provide all plans, analyses, and reports, from January 1, 2008 to the present, discussing the possible expiration, renewal, extension, cancellation, or expansion of the scope of any roaming agreements between AT&T and T-Mobile USA.
 40. Except as provided in response to Request No. 39, provide all plans, analyses, and reports discussing: (a) past or current roaming or wholesale negotiations and agreements; (b) consideration of roaming or wholesale proposals or agreements; and (c) the cost of roaming or wholesale.
 41. Identify any person (including mobile wireless service providers) to whom the Company provides,

pursuant to a roaming agreement, wholesale agreement, or other agreement, each relevant service for use by that person's subscribers in a geographic area where that person does not offer mobile wireless services using its own network. For each person whose subscribers used the Company's relevant services, provide a list, in csv format, on a monthly basis and for each relevant area in which the relevant service is provided:

- a. the name of the person;
 - b. the total number of subscribers of the person using the Company's relevant services;
 - c. the total minutes or bytes, as relevant, of the Company's relevant service used by the person's subscribers;
 - d. the total amount the Company charged the person for the Company's relevant service used by that person's subscribers; and
 - e. the Company's total sales of roaming services, total sales of wholesale services, and total sales of other such services, in dollars, minutes of use, and in bytes of data used separately for GSM, EDGE, WCDMA, UMTS, HSPA, and HSPA+.
42. Provide all documents discussing how the Proposed Transaction might affect international roaming in the United States and U.S. customers roaming internationally.
 43. Provide all plans, analyses, and reports discussing whether and how the Proposed Transaction might affect partnership possibilities for public safety broadband deployment (including partnerships for infrastructure, roaming/priority access, and facilities).
 44. Provide all plans, analyses, and reports discussing whether and how the Proposed Transaction might affect network resiliency for infrastructure and facilities by decreasing the number of facilities-based providers.
 45. To the extent not already provided, provide all documents cited in the Public Interest Statement and the attached declarations, and any data, documents or analyses provided to, reviewed by, or relied upon in preparing those declarations, grouped by declaration/Public Interest Statement.
 46. Provide an organization chart and personnel directory in effect since January 1, 2009, for the Company as a whole and for each of the Company's facilities or divisions involved in any activity relating to any relevant product or any relevant service.
 47. Provide a list of all databases, or datasets used or maintained by the Company at any time after January 1, 2007, that constitute, record, or discuss: (a) discount requests or approvals; (b) sales personnel call reports; (c) meeting competition requests or approvals; (d) win/loss reports; (e) prices, quotes, estimates, or bids submitted to any customer; (f) the results of any bid or quote submitted to any customer or prospective customer; (g) customer relationship databases; (h) products and product codes; (i) facilities; (j) production; (k) sales; (l) prices; (m) margins; (n) costs, including production costs, development costs, distribution costs, standard costs, expected costs, and opportunity costs; (o) patents or other intellectual property; (p) research or development projects, including expenditures and significant accomplishments.
 48. Provide data for the Company's cell sites, network deployment, voice and data traffic, and backhaul, as specified in Attachment A.
 49. Provide the Company's billing data, including data on plans, subscribers, and additions, as specified in Attachment B.

50. 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.

Attachment A - Formatting Instructions

All data should be submitted in a .csv (comma-delimited) format.

The sheets in the workbook provide a template for how the tables should be designed.

The required format for the entries in each column/field is indicated in the instructions for each sheet.

All entries in Text fields must be in quotation marks (e.g. "AT&T").

Column entries in bold red indicate that the party should enter only one of the possible entries listed for that column. Unless otherwise noted, no other entries should be entered.

Do not submit any data for U.S. territories or the Gulf of Mexico (CMAs 91, 147, 169, 202, 204, and 306).

Data for all of the tables should be submitted for the second week of the month for the following months: 3/07, 6/07, 9/07, 12/07, 3/08, 6/08, 9/08, 12/08, 3/09, 6/09, 9/09, 12/09, 3/10, 6/10, 9/10, 12/10, and 3/11.

Attachment A Table - Site Data

The following data descriptions apply to the columns of the "Site Data" table. The "Site Data" table should contain one row for every site utilized by AT&T or T-Mobile. The site IDs in this table should correspond to the site IDs entered in the other requested tables.

Column A:

Date

Description: The month for which the data is being collected. Submit data on a quarterly basis from March 2007-March 2011 for the second week of the month.
Format of Field: Text - YYYY_MM
Possible Entries: 2007_03 2009_03 2009_06 2009_09 2009_12 2010_03 2010_06 2010_09 2010_12 2011_03

Column B:

Current Operator

Description: The current operator of the site to which this data record applies. In cases where an AT&T site and T-Mobile site share the same tower or other supporting structure, each site should be entered separately.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C:

Company Owned: "Y" or "N"

Description: Is the location of the site owned by the carrier
Format of Field: Text
Possible Entries: "Y" or "N"

Column D:

Collocated: "Y" or "N"

Description: Is the location of the site Co-located with other Wireless Tenants
Format of Field: Text
Possible Entries: "Y" or "N"

Column E:

of Wireless Tenants

Description: Provide the number of Wireless Tenants located at the site
Format of Field: Number - Integer
Example Entries: 1, 2, 3, etc.

Column F:

Total # spaces available at the Site for other wireless operators
--

Description: The number of spaces available for other mobile wireless service providers
Format of Field: Number - Integer
Example Entries: 1, 2, 3, etc.

Attachment A Table - Site Data

Column G:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Site ID</td> </tr> </table> <p><i>Description:</i> A unique site ID for the site to which this data record applies. <i>Format of Field:</i> Text <i>Example Entries:</i> "AL0001", "VA0128", etc.</p>	Site ID
Site ID		
Column H:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Number of Sectors</td> </tr> </table> <p><i>Description:</i> This field provides an integer representing the number of sectors this site utilizes. <i>Format of Field:</i> Number - Integer <i>Example Entries:</i> 1, 2, 3, etc.</p>	Number of Sectors
Number of Sectors		
Column I:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Latitude</td> </tr> </table> <p><i>Description:</i> This field is the latitude of the site in decimal form to at least six significant digits. <i>Format of Field:</i> Number - At least 6 decimal places <i>Example Entries:</i> 37.705278, 34.299167, etc.</p>	Latitude
Latitude		
Column J:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Longitude</td> </tr> </table> <p><i>Description:</i> This field is the longitude of the site in decimal form to at least six significant digits. <i>Format of Field:</i> Number - At least 6 decimal places <i>Example Entries:</i> -77.424444, -102.860556, etc.</p>	Longitude
Longitude		
Column K:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">County FIPS</td> </tr> </table> <p><i>Description:</i> This field is the five-digit FIPS code - based on 2010 designations - of the county in which the site is located. <i>Format of Field:</i> Text <i>Example Entries:</i> "01001", "51059", etc.</p>	County FIPS
County FIPS		
Column L:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">CMA</td> </tr> </table> <p><i>Description:</i> This field represents the standard market number of the CMA in which the site is located. <i>Format of Field:</i> Number - Integers 1 - 722, excluding 91, 147, 169, 202, 204, and 306</p>	CMA
CMA		
Column M:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Site Type</td> </tr> </table> <p><i>Description:</i> This field indicates the type of site to which the record applies using one of the possible entries listed below. <i>Format of Field:</i> Text Possible Entries: "Macro_Tower" An outdoor macrocell mounted on a monopole, guyed tower, or free standing tower "Macro_Building" An outdoor macrocell mounted on a building "Macro_Other" An outdoor macrocell that does not fit the previous categories (silo, water tower, etc.) "Microcell" An outdoor cell classified by the vendor as a microcell "Outdoor Pico" An outdoor cell classified by the vendor as a picocell "Indoor Pico" An indoor cell classified by the vendor as a picocell "Outdoor DAS" An outdoor Distributed Antenna System "Indoor DAS" An indoor Distributed Antenna System "Repeater" A cell that repeats/boosts the signal of another cell "Other" A cell that does not meet any of the above descriptions</p>	Site Type
Site Type		
Column N:	<table border="1" style="border-collapse: collapse;"> <tr> <td style="text-align: center;">Site Structure Ownership</td> </tr> </table>	Site Structure Ownership
Site Structure Ownership		

Attachment A Table - Site Data

Description:

This field indicates whether the tower, antenna structure, or other facility on which the site is located is owned by a wireless operator (or its affiliate), or whether it is owned by an independent entity. If the structure is owned by a wireless operator or its affiliate, include the name of the wireless operator.

Format of Field:

Text

Example Entries:

"AT&T", "T-Mobile", "Sprint", "US Cellular", "independent entity"

Column O:

Site Geographic Classification

Description:

This field indicates the morphology of the area that the site serves using one of the possible entries listed below. Please provide a description of the methodology used to determine these classifications in a separate attachment.

Text

Format of Field:

Possible Entries:

"Urban"
"Suburban"
"Rural"

Date	Current Operator	Company Owned: "Y" or "N"	Collocated: "Y" or "N"	# of Wireless Tenants	Total # spaces available at the Site for other wireless operators	Site ID	Number of Sectors	Latitude	Longitude	County FIPS

CMA	Site Type	Site Structure Ownership	Site Geographic Classification

Attachment A Table - Deployed Carriers

The following data descriptions apply to the columns of the "Deployed Carriers" table (where "carriers" refers to channels or portions of spectrum used in the network rather than operators or service providers). In general, this table should contain one row for each carrier/channel deployed at each AT&T and T-Mobile site sector. Because sites and sectors can include multiple carriers/channels, the same site/sector ID may appear in multiple rows.

Column A:

Date

Description: The month for which the data is being collected. Submit data on a quarterly basis from March 2007-March 2011 for the second week of the month.
Format of Field: Text - YYYY_MM
Possible Entries: 2007_03 2009_03 2011_03
 2007_06 2009_06
 2007_09 2009_09
 2007_12 2009_12
 2008_03 2010_03
 2008_06 2010_06
 2008_09 2010_09
 2008_12 2010_12

Column B:

Current Operator

Description: The current operator of the site to which this data record applies. In cases where an AT&T site and T-Mobile site share the same tower or other supporting structure, each site should be entered separately.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C:

Site ID

Description: A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column D:

Sector ID

Description: A unique sector ID for the sector to which this data record applies, created by adding a suffix to the site ID.
Format of Field: Text
Example Entries: Suffix examples include "A", "B", "C" or "1", "2", "3"

Column E:

Band

Description: The frequency band in which the channel/carrier in this data record operates.
Format of Field: Text
Possible Entries: "Cellular"
 The Cellular 850 MHz band (824-859 MHz and 869-884 MHz)

Attachment A Table - Deployed Carriers

- "PCS" The PCS 1900 MHz band (1850-1910 MHz and 1930-1990 MHz)
- "AWS" The AWS-1 band (1710-1755 MHz and 2110-2155 MHz)
- "Lower 700" The Lower 700 MHz band (698-716 MHz and 728-746 MHz)

Column F: **Block**
 Description: The frequency block in which the channel/carrier is operating. Do not report subblocks
 Format of Field: Text

- Possible Entries:**
- "A" Band = Cellular
 - "B" Band = Cellular
 - "A" Band = PCS
 - "B" Band = PCS
 - "C" Band = PCS
 - "D" Band = PCS
 - "E" Band = PCS
 - "F" Band = PCS
 - "A" Band = AWS
 - "B" Band = AWS
 - "C" Band = AWS
 - "D" Band = AWS
 - "E" Band = AWS
 - "F" Band = AWS
 - "B" Band = Lower 700
 - "C" Band = Lower 700

Column G: **Technology of Carrier**
 Description: This field indicates the technology standard used by the channel/carrier described in this record.
 Format of Field: Text

- Possible Entries:**
- "GSM" A carrier/channel that only supports GSM (GMSK modulation)
 - "GPRS" A carrier/channel that supports GSM and GPRS
 - "EDGE" A carrier/channel that supports GSM, GPRS and EDGE
 - "WCDMA" A wideband CDMA carrier conforming to Release 4 or earlier
 - "HSDPA" A wideband CDMA carrier conforming to UTRA Release 5
 - "HSUPA_HSPA" A wideband CDMA carrier conforming to UTRA Release 6
 - "HSPA+" A wideband CDMA carrier conforming to UTRA Release 7
 - "LTE" An LTE carrier conforming to E-UTRA Release 8 or later
 - "Other" A carrier that does not conform to one of the technologies listed above

Column H: **Carrier BW_MHz**
 Description: This field contains the bandwidth in MHz of the carrier described in this record

Attachment A Table - Deployed Carriers

Format of Field: Number

Possible Entries:

- 0.2 Carrier = GSM
- 0.2 Carrier = GPRS
- 0.2 Carrier = EDGE
- 5 Carrier = WCDMA
- 5 Carrier = HSDPA
- 5 Carrier = HSPA
- 5 Carrier = HSPA+
- 1.4 Carrier = LTE
- 3 Carrier = LTE
- 5 Carrier = LTE
- 10 Carrier = LTE
- Carrier = Other

Column I:

Center Freq_MHz

Description:

This field contains the unrounded center frequency in MHz of the downlink carrier described in this record.

Format of Field: Number

Example Entries: 1937.5, 2142.625, etc.

Column J:

Carrier Active

Description:

This field is used to indicate whether a carrier is actively carrying customer traffic.

Format of Field: Text

Possible Entries: "Yes"

"No"

Indicates that the carrier is carrying commercial traffic generated by paying customers
Indicates that the carrier is not yet deployed, used for test or trial purposes, or turned off

Attachment A Table - Traffic

The following data descriptions apply to the columns of the "Traffic" table. In general, this table is intended to provide data on the average busy hour voice and data traffic at each AT&T and T-Mobile site/sector, by technology group and by spectrum band. All busy hour data shall be the average bouncing busy hour (BBH) over the 5-day business week period (Mon-Fri) in the second week of the month. The BBH is the one-hour period during the day in which the highest usage is measured, starting on the hour or half hour, and the highest usage hour may vary from day to day. In the column headings, "G" indicates traffic carried by on a GSM/GPRS/EDGE network and "H" indicates traffic carried on a WCDMA/HSPA/HSPA+ (UTRA) network.

Column A:

Date

Description: The month for which the data is being collected. Submit data on a quarterly basis from March 2007-March 2011 for the second week of the month.
Format of Field: Text - YYYY_MM
Possible Entries: 2007_03 2009_03 2011_03
 2007_06 2009_06
 2007_09 2009_09
 2007_12 2009_12
 2008_03 2010_03
 2008_06 2010_06
 2008_09 2010_09
 2008_12 2010_12

Column B:

Current Operator

Description: The operator of the site and sector to which this data record applies.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C:

Site ID

Description: A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column D:

Sector ID

Description: A unique sector ID for the sector to which this data record applies, created by adding a suffix to the site ID.
Format of Field: Text
Example Entries: Suffix examples include "A", "B", "C" or "1", "2", "3"

Cellular Band - GSM/GPRS/EDGE

Attachment A Table - Traffic

Column E:

**Cell_G_Avg BBH
Voice Traffic_Erlangs**

Description:

BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the Cellular band

Format of Field:

Number

Column F:

**Cell_G_Avg BBH Data
Traffic Downlink_MB**

Description:

BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the Cellular band

Format of Field:

Number

Column G:

**Cell_G_Avg BBH Data
Traffic Uplink_MB**

Description:

BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the Cellular band

Format of Field:

Number

Cellular Band - WCDMA/HSPA/HSPA+

Column H:

**Cell_H_Avg BBH
Voice Traffic_Erlangs**

Description:

BBH voice traffic in Erlangs carried by UTRA carriers in the Cellular band

Format of Field:

Number

Column I:

**Cell_H_Avg BBH Data
Traffic Downlink_MB**

Description:

BBH base to mobile data traffic in MB carried by UTRA carriers in the Cellular band

Format of Field:

Number

Column J:

**Cell_H_Avg BBH Data
Traffic Uplink_MB**

Description:

BBH mobile to base data traffic in MB carried by UTRA carriers in the Cellular band

Format of Field:

Number

PCS Band - GSM/GPRS/EDGE

Column K:

**PCS_G_Avg BBH
Voice Traffic_Erlangs**

Attachment A Table - Traffic

Description: BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the PCS band
Format of Field: Number

Column L:

**PCS_G_Avg BBH Data
Traffic Downlink_MB**

Description: BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the PCS band
Format of Field: Number

Column M:

**PCS_G_Avg BBH Data
Traffic Uplink_MB**

Description: BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the PCS band
Format of Field: Number

PCS Band - WCDMA/HSPA/HSPA+

Column N:

**PCS_H_Avg BBH
Voice Traffic_Erlangs**

Description: BBH voice traffic in Erlangs carried by UTRA carriers in the PCS band
Format of Field: Number

Column O:

**PCS_H_Avg BBH Data
Traffic Downlink_MB**

Description: BBH base to mobile data traffic in MB carried by UTRA carriers in the PCS band
Format of Field: Number

Column P:

**PCS_H_Avg BBH Data
Traffic Uplink_MB**

Description: BBH mobile to base data traffic in MB carried by UTRA carriers in the PCS band
Format of Field: Number

AWS Band - GSM/GPRS/EDGE

Column Q:

**AWS_G_Avg BBH
Voice Traffic_Erlangs**

Description: BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the AWS band

Attachment A Table - Traffic

Format of Field: Number

**AWS_G_Avg BBH
Data Traffic
Downlink_MB**

Column R:

Description: BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the AWS band
Format of Field: Number

**AWS_G_Avg BBH
Data Traffic
Uplink_MB**

Column S:

Description: BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the AWS band
Format of Field: Number

AWS Band - WCDMA/HSPA/HSPA+

**AWS_H_Avg BBH
Voice Traffic_Erlangs**

Column T:

Description: BBH voice traffic in Erlangs carried by UTRA carriers in the AWS band
Format of Field: Number

**AWS_H_Avg BBH
Data Traffic
Downlink_MB**

Column U:

Description: BBH base to mobile data traffic in MB carried by UTRA carriers in the AWS band
Format of Field: Number

**AWS_H_Avg BBH
Data Traffic
Uplink_MB**

Column V:

Description: BBH mobile to base data traffic in MB carried by UTRA carriers in the AWS band
Format of Field: Number

LTE

**LTE_Avg BBH Data
Traffic Downlink_MB**

Column W:

Description: BBH base to mobile data traffic in MB carried by E-UTRA carriers in any band
Format of Field: Number

Attachment A Table - Traffic

Column X:

LTE_Avg BBH Data Traffic Uplink_MB

Description: BBH mobile to base data traffic in MB carried by E-UTRA carriers in any band
Format of Field: Number

Attachment A Table - Backhaul

The following data descriptions apply to the columns of the "Backhaul" sheet. In general, this sheet is intended to provide data on the type and amount of backhaul capacity provisioned at each AT&T and T-Mobile site.

Column A:

Date

Description: The month for which the data is being collected. Submit data on a quarterly basis from March 2007-March 2011 for the second week of the month.
Format of Field: Text - YYYY_MM
Possible Entries: 2007_03 2009_03 2011_03
 2007_06 2009_06
 2007_09 2009_09
 2007_12 2009_12
 2008_03 2010_03
 2008_06 2010_06
 2008_09 2010_09
 2008_12 2010_12

Column B:

Current Operator

Description: The operator of the site and backhaul to which this data record applies.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C:

Site ID

Description: A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column D:

Backhaul Medium

Description: The type of technology used for backhaul at this site using one of the possible entries listed below.
Format of Field: Text
Example Entries: "Fiber"
 "Copper"
 "Hybrid Fiber Coax (HFC)"
 "Fixed Wireless/Satellite"

Column E:

Backhaul Provider Name

Description: The name of the company providing backhaul services to the site.
Format of Field: Text

Attachment A Table - Backhaul

Example Entries: "Verizon", "AT&T", "FiberTower", "Bridgewave", etc.

Backhaul Provider Type

Column F:

Description: The type of company providing backhaul services to the site.

Format of Field: Text

Example Entries: "ILEC", "CLEC/IXC", "Cable Provider", "Wireless", "Other", etc.

Backhaul Capacity Incoming_Mbps
--

Column G:

Description: One-way maximum capacity of backhaul link in Mbps given capabilities of existing HW - incoming to the base station

Format of Field: Number

Backhaul Capacity Outgoing_Mbps
--

Column H:

Description: One-way maximum capacity of backhaul link in Mbps given capabilities of existing HW - outgoing from the base station

Format of Field: Number

Capacity Unlit (Dark) Fiber

Column I:

Description: If fiber, capacity of unlit (dark) fiber.

Format of Field: Number

Backhaul Cost

Column J:

Description: The weekly cost of backhaul capacity used to transport traffic between the site and the switch. If backhaul capacity is purchased for as a package for multiple sites, report the average cost for each site.

Format of Field: Number

Current Operator	Site ID	Backhaul Medium	Backhaul Provider Name	Backhaul Provider Type	Backhaul Capacity Incoming_Mbps

Attachment B Instructions

For each month, beginning 01/01/08 and extending through 03/31/11, please provide all billing data requested in Attachment B for each mobile wireless price plan offered by your company on a monthly basis, in each CMA of the United States. You should submit information on each mobile wireless price plan that (a) was available to new subscribers at any time between 01/01/08 and 03/31/11, and/or (b) had at least one subscriber at any time between 01/01/08 and 03/31/11 in any CMA. A wireless plan is defined here as any unique combination of fields 2 through 32 in the "Billing_Plans.CSV" data below. For example, if one plan has the call waiting feature and another is identical in every respect except that it does not include this feature then it should be listed as a separate plan. If your firm offers an individual voice plan with 450 minutes, then this offering should be a separate plan and have a separate line in the data and unique ID code for every possible combination of text and data plans that a consumers could pair with this voice offering.

Please provide these files electronically in comma separated value (.csv) format. The format is indicated for the entries in each column/field in the instructions below. All entries in text string fields must be in quotation marks (e.g. "AT&T"). Do not enter any text objects in numeric fields (e.g. do not include \$ in front of any dollar figures). Code any unlimited values numerically as 9999 and any values that are unknown as -1. Each Excel sheet should be submitted as a separate .csv database. As a result, each carrier should produce three separate .csv files from its billing system data. Every CSV database should include all variables listed in each sheet. All databases must contain the following four variables:
(1) the unique plan identifier; (2) the CMA code; (3) the month and; (4) the year. These four variables should uniquely define the observations in each database so that the databases can be merged using these variables.

Billing Data Instructions

Billing_Plans.CSV

Field	Variable Name	Format	Field Label	Description
1	id	numeric	Unique ID code for plan	Provide a unique identifier for each plan as described in the instructions.
2	cma	numeric	CMA code	Provide the code for the Cellular Market Area (CMA) of the subscribers
3	month	2 digit numeric	Month	Provide the billing month in numeric format: 01= January 12=December
4	year	4 digit numeric	Year	Provide the four digit year of the billing month
5	bill_code	text string	Plan billing code	Provide the billing system code for the plan (not necessarily unique)
6	plan_name	text string	Plan name/ description	The name or description of the plan as used in the billing system
7	month_first	2 digit numeric	Month first offered	The month the plan was first offered to new subscribers
8	year_first	4 digit numeric	Year first offered	The year the plan was first offered to new subscribers
9	month_last	2 digit numeric	Month last offered	The month the plan was last offered to new subscribers, if no longer available
10	year_last	4 digit numeric	Year last offered	The year the plan was last offered to new subscribers, if no longer available
11	plan_type	1 digit numeric	Plan type	The plan's subscriber type: 1=consumer/retail prepaid 2=consumer prepaid 3=consumer data-only plan 4=other consumer plans (Note: Include small business subscribers but not MVNO, M2M or enterprise customers in any calculations or plan definitions)
12	plan_brand	1 digit numeric	Plan branding/ marketing	Whether the plan is branded and market by the firm or an authorized reseller: 0=reseller 1=firm
13	contract	0/1 numeric	Contract required	Whether the plan requires new subscribers to sign a service contract: 1=contract required 0=no contract required
14	contract_length	numeric	Contract length in years	Number of years of service required by contract
15	etf_reduce	numeric	Early termination fee amount	The ETF fee typically required by the service contract (enter zero if no ETF)
16	shared	0/1 numeric	ETF reduction indicator	Indicator variable for whether the ETF declines over contract period
17	national	0/1 numeric	Shared plan	Whether the minutes of the plan are shared across multiple lines (i.e. family plan): 0 = individual plan 1=shared plan
18	min_any	0/1 numeric	National calling plan	An indicator of whether the plan's home calling area is national or local/regional: 1=national 0=regional/local
19	min_peak	numeric	Anytime minutes	The number of anytime minutes included in the plan. If unlimited code as 9999
20	peak_hours	numeric	Peak minutes	The number of peak minutes included in the plan. If unlimited code as 9999
21	min_offpeak	numeric	Daily hours in peak period	The number of hours per day that are billed as peak hours. If unlimited code as 9999
22	min_mobmob	numeric	Offpeak minutes	The number of off-peak (e.g. nights and weekends) minutes included in the plan. If unlimited code as 9999
23	unlim_onnet	0/1 numeric	Mobile to mobile minutes	The number of mobile to mobile minutes included in the plan. If unlimited code as 9999
24	unlim_friends	0/1 numeric	Unlimited on-network calling	An indicator for whether the plan offers unlimited calling to subscribers of the firm's wireless network: 0=No 1=Yes
25	min_anylost	0/1 numeric	Unlimited family/ friends calling	An indicator for whether plan offers unlimited calling to some numbers chosen by the subscriber: 0=No 1=Yes
26	min_roam	0/1 numeric	Unused minutes lost at end of billing cycle	An indicator for whether or not all unused anytime/peak minutes are lost at the end of the billing cycle: 0=No 1=Yes
27	over_roam	numeric	Voice roaming minutes	The number of voice roaming minutes included in the plan. If unlimited code as 9999
28	data	numeric	Voice roaming per minute coverage rate	The per-minute coverage rate for roaming minutes in excess of the minutes included in the plan
29	data_name	numeric	Number of megabytes in plan	The number of megabytes included in the plan (if any). If unlimited code as 9999, if no plan code as 0. If throttled indicate at what value data is throttled. If "unlimited" but capped indicate the usage cap.
30	smart_data	text string	Data plan name	The name or description of the data plan as used in the billing system
31	texts	0/1 numeric	Smartphone data plan	An indicator for whether the data plan is available to smartphone devices: 0=No 1=Yes
32	text_name	numeric	Number of text messages in plan	The number of text messages included in the plan (if any). If unlimited code as 9999, if no plan, code as zero
33	charge_prime_access	text string	Text plan name	The name or description of the messaging plan as used in the billing system
34	charge_primeline	numeric	Monthly charge for primary line	The monthly recurring access charge for the primary line
35	charge_add_access	numeric	Activation fee for primary line	The one time activation fee for the primary line
36	charge_addline	numeric	Monthly charge per additional line	The monthly recurring access charge per additional line on the account
37	over_any	numeric	Activation fee per additional line	The one time activation fee per additional line on the account
38	access_text	numeric	Per-minute anytime coverage rate	The per-minute coverage rate for anytime minutes in excess of the minutes included in the plan
39	over_text	numeric	Monthly charge for text plan	The monthly recurring charge for the text messages included in the plan
40	access_data	numeric	Per text coverage charge	The per-text coverage rate for text messages in excess of the text messages included in the plan
41	over_data	numeric	Monthly charge for data plan	The monthly recurring charge for the megabytes of data included in the plan
42	over_data	numeric	Per megabyte coverage charge	The per-megabyte coverage rate for data in excess of the megabytes included in the plan. If no plan provide a la carte rate

Billing Data Instructions

Billing_Subcs.CSV

<u>Field</u>	<u>Variable Name</u>	<u>Format</u>	<u>Field Label</u>	<u>Description</u>
1	id	numeric	Unique ID code for plan	Provide a unique identifier for each plan as described in the instructions.
2	cma	numeric	CMA code	Provide the code for the Cellular Market Area (CMA) of the subscribers
3	month	2 digit numeric	Month	Provide the billing month in numeric format: 1= January 12=December
4	year	4 digit numeric	Year	Provide the four digit year of the billing month
5	lines_activeon	numeric	Active contract lines	The number of lines with an active status (as indicated in billing system) that are subject to a contract
6	lines_activeoff	numeric	Active off-contract lines	The number of lines with an active status (as indicated in billing system) that are not subject to a contract
7	lines_inactive	numeric	Inactive lines	The number of lines that have neither an active nor cancelled status but remain subscribers in the billing system
8	lines_iphone	numeric	iPhone lines	The number of iPhone lines associated with iPhone devices
9	lines_othersmart	numeric	Smartphone lines	The number of active lines that are associated with other (non-iPhone) smartphone devices
10	gross_additions	numeric	Gross line additions	The number of gross new line additions by plan, month and CMA
11	disconnect_vol	numeric	Voluntary disconnects	The number of lines that were voluntarily terminated of all wireless services with the company. (Note: Only subscribers who have terminated all wireless service with firm should be counted as disconnects.)
12	disconnect_invol	numeric	Involuntary disconnects	The number of lines that have been involuntarily terminated from all wireless services with the company
13	renewals	numeric	Total number of contract renewals	The number of lines on the plan that have renewed their contracts in the given month and CMA
14	avg_lines	numeric	Average number of lines per account	The average number of subscriber lines per active account under the plan
15	arpu	numeric	Average revenue per user	The average revenue per user/line (active) for the plan
16	arpu_data	numeric	Average data revenue per user	The average data revenue per user/line (active) for the plan
17	perc_smart	numeric	Percent smartphone users	The percentage of plan users with smartphone devices
18	perc_iphone	numeric	Percent iPhone users	The percentage of plan users with iPhone devices

Billing_Additions.CSV - (Note: Data for these fields should be limited to new gross line additions in the given month and CMA)

Field	Variable Name	Format	Field Label	Description
1	id	numeric	Unique ID code for plan	Provide a unique identifier for each plan as described in the instructions.
2	cma	numeric	CMA code	Provide the code for the Cellular Market Area (CMA) of the subscribers
3	month	2 digit numeric	Month	Provide the billing month in numeric format: 1= January 12=December
4	year	4 digit numeric	Year	Provide the four digit year of the billing month
5	cpga	numeric	Cost per gross subscriber addition	The total cost per gross subscriber addition to the plan
6	cpga_market	numeric	Marketing/advertising cost per gross addition	The total marketing/advertising costs incurred per gross subscriber/line addition to the plan
7	cpga equip	numeric	Equipment/handset costs per gross addition	The total equipment/handset subsidy costs incurred per gross addition to the plan in the given month and CMA
8	cpga_sub	numeric	Other promotional costs per gross addition	Any other subsidy costs incurred by the firm per gross subscriber/line addition
9	cpga_other	numeric	Non-promotional costs per gross addition	All other non-promotional costs per gross addition
10	total_discounts	numeric	Total discounts/promotions per gross addition	Provide the annual value of all discounts and promotions per gross addition to new subscribers of the plan. These could include handset discounts, plan discounts, activation fee waivers or any service codes for free/additional services among others. Do not include advertising/marketing costs in the calculation.
11	total_cost	numeric	Average first year total cost of ownership	Compute the total cost of ownership for all new subscribers in the given month and equipment
12	new_bill	numeric	Average bill in first month of ownership	Provide the average first month bill of all new subscribers in the given month and CMA
13	new_accounts	numeric	The number of new accounts added	The number of new active accounts added for each plan in the given month and CMA
14	new_charge_prime	numeric	Average primary activation fee per new line	Provide the average activation fee per new primary line in the given month and CMA
15	new_charge_add	numeric	Average activation fee per new additional line	Provide the average activation fee per new additional (non-primary) line in the given month and CMA
16	fica	numeric	FICA score	Provide the average FICA credit score for new activations
17	new_nonsmart	numeric	Number of new non-smartphone users	The number of new subscribers that purchased non-smartphones
18	new_nonsmart_price	numeric	Average price paid for non-smartphone	The average price paid per new non-smartphone device for all new subscribers
19	new_iphones	numeric	Number of new iPhone users	The number of new subscribers that purchased iPhones
20	new_iphone_price	numeric	Average price paid for iPhone devices	The average price paid per iPhone device by new subscribers
21	new_othersmart	numeric	Number of new other (non-iPhone) smartphone users	The number of new subscribers that purchased other smartphones
22	new_othersmart_price	numeric	Average price paid for other smartphone devices	The average price paid per other (non-iPhone) smartphone device by new subscribers
23	new_idevice	numeric	Number of new other internet devices	The number of new subscribers that purchased other internet devices
24	new_idevice_price	numeric	Average price paid for other internet devices	The average price paid per other internet device by new subscribers

Billing_Plans

id	cma	month	year	bill_	plan_	month_	year_	month_	year_	year_	month_	last	year_	plan_	plan_	contract_	contract_	length	contract_	etf	etf_	reduce	shared	national	min_	min_	peak_	min_	min_	mob				
				code	name	first	first	last	last	last	last			type	brand											any	peak	hours	offpeak	mob				

Billing_Plans

unlim_ onnet	unlim_ friends	min_ any lost	min_ roam	over_ roam	data	data_ name	smart_ data	texts	text_ name	charge_ prime_ access	charge_ prime_ line	charge_ add_ access	charge_ addline	over_ any	access_ text	over_ text	access_ data	over_ data	

Billing_Sub

id	cma	month	year	lines_activeon	lines_activeoff	lines_inactive	lines_iphone	lines_othersmart	gross_additions	disconnect_vol

Billing_Subs

disconnect_invol	renewals	avg_lines	arpu	arpu_data	perc_smart	perc_iphone

Billing_Additions

new_iphone_ price	new_other_ smart	new_other smart_ price	new_idevice	new_idevice_ price

Attachment C Table - Spectrum

The following field descriptions apply to the columns of the "Spectrum" table. Each operator should submit data for each county in which it currently holds spectrum. All data should be submitted in a .csv (comma-delimited) format. The Spectrum worksheet provides a template for how the table should be designed. The required format for the entries in each column/field is indicated in the instructions below. All entries in Text fields must be in quotation marks (e.g. "AT&T"). Column entries in red indicate that the party should enter only one of the possible entries listed for that column. Unless otherwise noted, no other entries should be entered.

Column A: County FIPS
Description: The five-digit FIPS code - based on 2010 designations - of the county in which the operator holds spectrum.
Format of Field: Text
Example Entries: "01001", "51059", etc.

Column B: Current Operator
Description: This current operator in the county to which this data record applies.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C: Amount of Spectrum
Description: Amount of spectrum planned for initial LTE deployment
Format of Field: Number

Column D: Planned Spectrum Band Absent Transaction
Description: Planned spectrum band for initial LTE deployment absent the Transaction
Format of Field: Text
Possible Entries: "Cellular"
 "PCS"
 "AWS"
 "Lower 700"
 The Cellular 850 MHz band (824-859 MHz and 869-884 MHz)
 The PCS 1900 MHz band (1850-1910 MHz and 1930-1990 MHz)
 The AWS-1 band (1710-1755 MHz and 2110-2155 MHz)
 The Lower 700 MHz band (698-716 MHz and 728-746 MHz)

**Planned Spectrum
Band With
Transaction**

Column E:

Description: Planned spectrum band for initial LTE deployment assuming the Transaction were consummated
Format of Field: Text

- Possible Entries:*
- "Cellular"** The Cellular 850 MHz band (824-859 MHz and 869-884 MHz)
 - "PCS"** The PCS 1900 MHz band (1850-1910 MHz and 1930-1990 MHz)
 - "AWS"** The AWS-1 band (1710-1755 MHz and 2110-2155 MHz)
 - "Lower 700"** The Lower 700 MHz band (698-716 MHz and 728-746 MHz)

Attachment C Table - Spectrum

The following field descriptions apply to the columns of the "Spectrum" table. Each operator should submit data for each county in which it currently holds spectrum. All data should be submitted in a .csv (comma-delimited) format. The Spectrum worksheet provides a template for how the table should be designed. The required format for the entries in each column/field is indicated in the instructions below. All entries in Text fields must be in quotation marks (e.g. "AT&T"). Column entries in red indicate that the party should enter only one of the possible entries listed for that column. Unless otherwise noted, no other entries should be entered.

Column A: County FIPS
Description: The five-digit FIPS code - based on 2010 designations - of the county in which the operator holds spectrum.
Format of Field: Text
Example Entries: "01001", "51059", etc.

Column B: Current Operator
Description: The current operator in the county to which this data record applies.
Format of Field: Text
Possible Entries: "AT&T"
 "T-Mobile"

Column C: Amount of Spectrum
Description: Amount of spectrum planned for initial LTE deployment
Format of Field: Number

Column D: Planned Spectrum Band Absent Transaction
Description: Planned spectrum band for initial LTE deployment absent the Transaction
Format of Field: Text
Possible Entries: "Cellular"
 "PCS"
 "AWS"
 "Lower 700"
 The Cellular 850 MHz band (824-859 MHz and 869-884 MHz)
 The PCS 1900 MHz band (1850-1910 MHz and 1930-1990 MHz)
 The AWS-1 band (1710-1755 MHz and 2110-2155 MHz)
 The Lower 700 MHz band (698-716 MHz and 728-746 MHz)

**Planned Spectrum
Band With
Transaction**

Column E:

Description: Planned spectrum band for initial LTE deployment assuming the Transaction were consummated
Format of Field: Text
Possible Entries: **"Cellular"** The Cellular 850 MHz band (824-859 MHz and 869-884 MHz)
"PCS" The PCS 1900 MHz band (1850-1910 MHz and 1930-1990 MHz)
"AWS" The AWS-1 band (1710-1755 MHz and 2110-2155 MHz)
"Lower 700" The Lower 700 MHz band (698-716 MHz and 728-746 MHz)

Spectrum

County FIPS	Current Operator	Amount of Spectrum	Planned Spectrum Band Absent Transaction	Planned Spectrum Band With Transaction

Attachment C Table - Bidding

Provide bidding information in response to an enterprise's formal or informal RFP (request for proposal) for wireless service contract from 01/01/08 to 03/01/11. Please provide all data files electronically in comma separated value (.csv) format. The required format for the entries in each column/field is indicated in the instructions below. All entries in text string fields must be in quotation marks (e.g. "AT&T"). Do not enter text objects in numeric fields (e.g. do not include commas or \$ signs in any dollar figures). Code any unlimited values numerically as 9999 and any values that are unknown as -1. All text strings should be limited to 400 characters.

Bidding Information

Field #	Variable Name	Format	Field Label	Description
1	Unique_RFP_Project_ID	numeric	Unique ID code for RFP Project	A unique identifier for each RFP (Request for Proposal) Project
2	Project_Name	text string	Project_Name	Name of the project for the RFP
3	Enterprise_Name	text string	Enterprise Name	The name of the enterprise issuing RFP (or seeking a bid informally)
4	Day_RFP	1 or 2 digit numeric	Day of the RFP month	The RFP issuing day of the month (1 - 31), N/A=-1
5	Month_RFP	1 or 2 digit numeric	RFP Month	The RFP issuing month (1= January 12=December) , N/A=-1
6	Year_RFP	4 digit numeric	RFP Year	The four digit RFP issuing year, N/A=9999
7	Bid_Participation	1 digit numeric	Bid_Participation	1=if a bid was submitted for the RFP, 0=otherwise
8	Project_Stage	text string	Project Stage	Stage of the RFP Project (production, submission, withdrawl. etc.)
9	Day_Bid	1 or 2 digit numeric	Day of the Bidding Month	The day of the month (1 - 31) when the bid was due, N/A=-1
10	Month_Bid	1 or 2 digit numeric	Bidding Month	The month (1= January 12=December) when the bid was due, N/A=-1
11	Year_Bid	4 digit numeric	Bidding Year	The four digit year when the bid was due, N/A=9999
12	Bid_Success	1 digit numeric	Bid Success	1=if a bid was successful or accepted and a contract was awarded, 0=otherwise
13	Reason_Loss	text string	Reason Loss	Reasons of not winning the contract (coverage, high price, project cancelled, etc)
14	Day_Contract_Awarded	1 or 2 digit numeric	Day of the contract awarding month	The day of the month (1 - 31) when the contract was awarded, N/A=-1
15	Month_Contract_Awarded	1 or 2 digit numeric	Contract Awarding Month	The month (1= January 12=December) when the contract was awarded, N/A=-1
16	Year_Contract_Awarded	4 digit numeric	Contract Awarding Year	The four digit year when the contract was awarded, N/A=9999
17	Enterprise_HQ_FIPS	text (5 chars)	Enterprise HQ FIPS (Year 2010) County Code	The year 2010 FIPS county code of the enterprise headquarter location
18	Enterprise_HQ_Str	text string	Enterprise HQ Street	The enterprise headquarter street address
19	Enterprise_HQ_City	text string	Enterprise HQ City	The enterprise headquarter residing city
20	Enterprise_HQ_State	text string	Enterprise HQ State	The enterprise headquarter residing state
21	Enterprise_HQ_ZIPCODE	5 digit numeric	Enterprise HQ ZIPCODE	The enterprise headquarter ZIPCODE
22	No_Bidders	2 digit numeric	Number Bidders	The total number of service providers believed to have bid for the RFP
23	RFP_Multi_State	1 digit numeric	RFP Multi State	1=if the RFP covers multiple States, 0=otherwise
24	Optr_Awarded	text string	Operator Awarded Contract	The name of the operator that was awarded the contract (e.g. AT&T, T-Mobile, Verizon, Sprint)
25	Bid_Amount	numeric	Amount Bid	Total dollar value of bid submitted for RFP for all lines (e.g. 1000000)
26	Contract_Value	numeric	Contract Value	Total value for the contract in dollars

Attachment C Table - Bidding

27	ATT_Bid	1 digit numeric	ATT Bid	1=if ATT believed to have submitted bid for the contract, 0=otherwise
28	VZ_Bid	1 digit numeric	VZ Bid	1=if Verizon believed to have submitted bid for the contract, 0=otherwise
29	TM_Bid	1 digit numeric	TM Bid	1=if T-Mobile believed to have submitted bid for the contract, 0=otherwise
30	Sprint_Bid	1 digit numeric	Sprint Bid	1=if Sprint believed to have submitted bid for the contract, 0=otherwise
31	Contract_Length	1 to 3 digit numeric	Contract Length	Expected contract length in month
32	Contract_Description	text string	Contract Description	Brief description of the contract
33	Total_Lines	numeric	Total number of lines	Total number of lines or SIMs in the contract (9999=if unlimited)
34	Month_AddLine_Price	1 to 4 digit numeric	Bidding Monthly Price Per Additional Line	Monthly price per additional line above the contract cap in dollars (roundup to the next full number)
35	International_Service	0/1 numeric	International Service	An indicator variable for whether the RFP included international voice and data services
36	Month_Total_Revenue	numeric	Month Total Revenue	Monthly total revenue in dollars=
37	Month_Voice_Revenue	numeric	Month Voice Revenue	Monthly voice revenue in dollars
38	Month_Text_Revenue	numeric	Month Text Revenue	Monthly text revenue in dollars
39	Month_Data_Revenue	numeric	Month Data Revenue	Monthly data revenue in dollars
40	Comment	text string	Comment	Any additional comment on the RFP, win or loss, etc

Bidding

Unique_RFP_Project_ID	Project_Name	Enterprise_Name	Day_RFP	Month_RFP	Year_RFP	Bid_Participation	Project_Stage	Day_Bid	Month_Bid	Year_Bid	Bid_Success	Reason_Loss

*including the firms believed to have bid for the RFP
 **if there are multiple bids under the same RFP, for instance, \$1 million for 5000 lines or 1.5 million to cover 10,000 lines, these bids should be listed on separate lines with the same unique RFP ID

Bidding

Day_Contract_Awarded	Month_Contract_Awarded	Year_Contract_Awarded	Enterprise_HQ_FIPS	Enterprise_HQ_Str	Enterprise_HQ_City	Enterprise_HQ_State

Bidding

Enterprise_HQ_ZIPCODE	No_Bidders*	RFP_Multi_State	Optr_Awarded	Bid_Amount**	Contract_Value	ATT_Bid	VZ_Bid	TM_Bid	Sprint_Bid	Contract_Length

Bidding

Contract_Description	Total_Lines	Month_Addline_Price	International_Service	Month_Total_Revenue	Month_Voice_Revenue	Month_Text_Revenue	Month_Data_Revenue	Comment

Attachment C Table - Subscriber Data

For each month, beginning 01/01/08 and extending through 03/31/11, provide all the CMA level data requested below. Please provide these files electronically in comma separated value (.csv) format. The required format for the entries in each column/field is indicated in the instructions below. All entries in text string fields must be in quotation marks (e.g. "AT&T"). Do not enter text objects in numeric fields (e.g. do not include \$ in front of any dollar figures). Code any unlimited values numerically as 9999 and any values that are unknown as -1. Separate CSV databases should be submitted for the following category of subscribers: (a) retail prepaid (b) retail prepaid (c) retail data-only plans. As a result, each carrier is required to produce three separate .csv files. Retail plans should include small-business accounts, do not include MVNO and M2M lines in data calculations.

Field #	Variable Name	Format	Field Label	Description (Q13)
1	month	2 digit numeric	Month	Provide the billing month in numeric format: 1= January 12=December
2	year	4 digit numeric	Year	Provide the four digit year of the billing month
3	cma	numeric	CMA name	Provide the CMA number to which the data applies
4	subs	numeric	Subscribers	The number of subscribers/lines in the CMA and month for the relevant service
5	subs_post	numeric	Postpaid subscribers	The number of postpaid subscribers
6	subs_pre	numeric	Prepaid subscribers	The number of prepaid subscribers
7	subs_smart	numeric	Smartphone subscribers	The number of internet device subscribers in the CMA and month
8	subs_iddevice	numeric	Internet device subscribers	The number of internet device subscribers in the CMA and month
9	rev_total	numeric	Total revenues	The total revenues (excluding taxes) from all subscribers in the given month and CMA
10	rev_service	numeric	Service revenues	The total revenues (excluding taxes) for all services provided in the given month and CMA
11	rev equip	numeric	Equipment revenues	The total revenues (excluding taxes) for all equipment sold in the given month and CMA
12	rev_other	numeric	Other revenues	The total revenues from all other services sold to subscribers in the CMA (e.g. GPS etc.)
13	rev_data	numeric	Data revenues	The total revenues from all data usage (excluding taxes) by all subscribers in the CMA
14	rev_voice	numeric	Voice revenues	The total revenues from all voice services
15	rev_mess	numeric	Messaging revenues	The total revenues from all messaging services by all subscribers in the CMA
16	rev_over	numeric	Overage revenues	The total revenues resulting from overage charges
17	use_min	numeric	Voice minute usage	The total minutes used by all subscribers in the given month and CMA
18	use_mb	numeric	Data MB usage	The total megabytes of data usage (excluding texting) by all subscribers in the CMA
19	use_mess	numeric	Text messages sent	The total number of messages (including SMS and MMS) sent by all subscribers in the CMA
20	arpu	numeric	Average revenue per user	The average revenue per user for all subscribers in the given month and CMA
21	arpu_mess	numeric	Average messaging revenue per user	The average messaging revenue per user for all subscribers
22	arpu_data	numeric	Average data revenue per user	The average data revenue per user for all subscribers
23	adds_gross	numeric	Gross additions	Provide the gross subscriber additions in the CMA in the given month
24	adds_net	numeric	Net additions	Provide the net subscriber additions in the CMA in the given month
25	churn	numeric	Churn rate	The churn rate for all subscribers in the CMA
26	retentions	numeric	Number of subscriber retentions	The number of saves/retentions in the CMA and month
27	retention_costs	numeric	Cost per retention	The cost per save/retention in the CMA and month
28	cpga	numeric	Cost per gross addition	The cost per gross addition for all subscribers in the given month and CMA
29	ccpu	numeric	Cash cost per user	Provide the average Cash Cost Per User (CCPU) for subscribers in the given month and CMA
30	cost_revserv	numeric	Cost of service revenues	Provide the total cost of the service revenues for the plan

Attachment C Table - Retail

The following field descriptions apply to the columns of the "Retail" table. In general, this table is intended to provide data on the locations of the various retail establishments where the company's products and services are sold and serviced. All data should be submitted in a .csv (comma-delimited) format. The Retail worksheet provides a template for how the table should be designed. The required format for the entries in each column/field is indicated in the instructions below. All entries in Text fields must be in quotation marks (e.g. "AT&T").

Column A: **ID**
Description: Unique ID code for each retail location
Format of Field: numeric
Example Entries: 1, 2, 3

Column B: **Street Address**
Description: Retail store location address
Format of Field: Text
Example Entries: "445 12th Street"

Column C: **City**
Description: Retail store location address Designated City Name
Format of Field: Text
Example Entries: "Seattle"

Column D: **State**
Description: Retail store location abbreviated state or US territory name
Format of Field: Text
Example Entries: "WA", "PR"

Column E: **Zip**
Description: Retail store location US Postal Service Implemented Postal Zone
Format of Field: Text
Example Entries: "20554"

Column F: **County FIPS**
Description: The five-digit FIPS code - based on 2010 designations - of the county in which the retail location is located
Format of Field: Text
Example Entries: "01001", "51059", etc.

Attachment C Table - Retail

Column G:	<table border="1"><tr><td data-bbox="337 262 407 436">Type of Retail Location</td></tr><tr><td data-bbox="337 436 407 646"><i>Description:</i> The type of retail establishment per company records. Please provide, in a separate attachment, an explanation of the types of retail locations used in company records.</td></tr><tr><td data-bbox="337 646 407 856"><i>Format of Field:</i> Text</td></tr><tr><td data-bbox="337 856 407 1066"><i>Example Entries:</i> "Company owned location", "Kiosk", "3rd party retailer", etc</td></tr></table>	Type of Retail Location	<i>Description:</i> The type of retail establishment per company records. Please provide, in a separate attachment, an explanation of the types of retail locations used in company records.	<i>Format of Field:</i> Text	<i>Example Entries:</i> "Company owned location", "Kiosk", "3rd party retailer", etc
Type of Retail Location					
<i>Description:</i> The type of retail establishment per company records. Please provide, in a separate attachment, an explanation of the types of retail locations used in company records.					
<i>Format of Field:</i> Text					
<i>Example Entries:</i> "Company owned location", "Kiosk", "3rd party retailer", etc					
Column H:	<table border="1"><tr><td data-bbox="570 262 639 436">For corporate stores/locations, will the location remain post transaction?</td></tr><tr><td data-bbox="570 436 639 646"><i>Description:</i> Will the company continue to provide customer services at this corporate store/location after the merger?</td></tr><tr><td data-bbox="570 646 639 856"><i>Format of Field:</i> Text</td></tr><tr><td data-bbox="570 856 639 1066"><i>Example Entries:</i> "Y" or "N"</td></tr></table>	For corporate stores/locations, will the location remain post transaction?	<i>Description:</i> Will the company continue to provide customer services at this corporate store/location after the merger?	<i>Format of Field:</i> Text	<i>Example Entries:</i> "Y" or "N"
For corporate stores/locations, will the location remain post transaction?					
<i>Description:</i> Will the company continue to provide customer services at this corporate store/location after the merger?					
<i>Format of Field:</i> Text					
<i>Example Entries:</i> "Y" or "N"					
Column I:	<table border="1"><tr><td data-bbox="802 262 872 436">For corporate stores/locations, will the location remain absent the Transaction?</td></tr><tr><td data-bbox="802 436 872 646"><i>Description:</i> Will the carrier continue to provide customer services at this corporate store/location absent the Transaction?</td></tr><tr><td data-bbox="802 646 872 856"><i>Format of Field:</i> Text</td></tr><tr><td data-bbox="802 856 872 1066"><i>Example Entries:</i> "Y" or "N"</td></tr></table>	For corporate stores/locations, will the location remain absent the Transaction?	<i>Description:</i> Will the carrier continue to provide customer services at this corporate store/location absent the Transaction?	<i>Format of Field:</i> Text	<i>Example Entries:</i> "Y" or "N"
For corporate stores/locations, will the location remain absent the Transaction?					
<i>Description:</i> Will the carrier continue to provide customer services at this corporate store/location absent the Transaction?					
<i>Format of Field:</i> Text					
<i>Example Entries:</i> "Y" or "N"					

Attachment C Table - Handsets

The following field descriptions apply to the columns of the "Handsets" table. This table provides data on the number of different individual devices - by category/type - that connected to each of the company's cell sites at least once during the second week of the month for every 3 months from March 2007 - March 2011 (e.g., how many iPhones connected to a cell site at least once during the second week of March 2009?). The Site IDs should correspond to the Site IDs provided in Attachment A. All data should be submitted in a .csv (comma-delimited) format. The Handsets worksheet provides a template for how the table should be designed. The required format for the entries in each column/field is indicated in the instructions below. All entries in Text fields must be in quotation marks (e.g. "AT&T").

Column A:

Date

 Requested data for the following periods in the second week in March, June, September and December for March 2007-March 2011
Format of Field: Text - "YYYY_MM"
Example Entries: "2007_03", "2011_03"

Column B:

Site ID

 A unique site ID for the site to which this data record applies.
Format of Field: Text
Example Entries: "AL0001", "VA0128", etc.

Column C:

County FIPS

 This field is the five-digit FIPS code of the county in which the site is located based on 2010 Census FIPS codes.
Format of Field: Text
Example Entries: "01001", "51059", etc.

Column D:

iPhones Connected

 Number of Apple iPhone handsets using the network during the reporting period
Format of Field: numeric

Column E:

Other Smartphones Connected

 Number of non-iPhone "Smartphones" using the network during the reporting period. Please provide in a separate attachment a list of smartphones or definition of how smartphones are categorized.
Format of Field: numeric

Attachment C Table - Handsets

Column F:

**Non-smartphone
Handsets
Connected**

Description:

Number of non-smartphone voice handsets using the network during the reporting period

Format of Field:

numeric

Column G:

**Non-voice Devices
Connected**

Description:

Number of non-voice devices -- such as USB laptop cards, mobile Wi-Fi devices, e-readers (Kindles, Nooks), tables (iPads, Atrix), etc -- using the network for IP data connections only during the reporting period

Format of Field:

numeric

Column H:

**M2M Devices
Connected**

Description:

Number of non-voice devices such metering and telemetry type devices, etc using the network during the reporting period

Format of Field:

period
numeric

Column I:

**Total
Handsets_Devices
Connected**

Description:

Total number of all connections on the network during the reporting period

Format of Field:

numeric

Attachment C Table - Network Quality

The following data descriptions apply to the columns of the "Network Quality" sheet. In general, this sheet is intended to provide data on network performance measures at the county level on a monthly basis. All data should be submitted in a .csv (comma-delimited) format. The Network Quality worksheet provides a template for how the table should be designed. The required format for the entries in each column/field is indicated in the instructions below. All entries in Text fields must be in quotation marks (e.g. "AT&T").

Column A:	date	The month and year for which the data is being collected. Submit data on a monthly basis from Jan. 2009 to Mar. 2011.
	<i>Description:</i>	Text - YYYY_MM
	<i>Format of Field:</i>	
Column B:	fips	The five-digit FIPS code - based on 2010 designations - of the county in which the site is located.
	<i>Description:</i>	Text
	<i>Format of Field:</i>	"01001", "51059", etc.
	<i>Example Entries:</i>	
Column C:	cma	The standard market number of the CMA in which the site is located.
	<i>Description:</i>	Number - Integers 1 - 722, excluding 91, 147, 169, 202, 204, and 306
	<i>Format of Field:</i>	
Column D:	calls	The total number of attempted calls in the county and month
	<i>Description:</i>	Number
	<i>Format of Field:</i>	
Column E:	call_drops	The total number of dropped calls in the county and month
	<i>Description:</i>	Number
	<i>Format of Field:</i>	
Column F:	call_blocks	The number of blocked calls in the county and month
	<i>Description:</i>	Number
	<i>Format of Field:</i>	
Column G:	data_requests	The total number of attempted data requests in the county and month
	<i>Description:</i>	Number
	<i>Format of Field:</i>	
Column H:	data_blocks	The number of blocked data request attempts in the county and month
	<i>Description:</i>	Number
	<i>Format of Field:</i>	

Column I:

data_speed

Description:

The average download rate for all users on the network in the county and month

Format of Field:

Number

Network Quality

date	fips	cma	calls	call_drops	call_blocks	data_requests	data_blocks	data_speed

Definitions

In this Information and Document Request, the following terms shall have the following meanings (such meanings to be equally applicable to both the singular and plural forms of the terms defined):

1. The terms “Company” or “AT&T” mean AT&T Inc., its parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing. The terms “parent”, “subsidiary,” “affiliate,” and “joint venture” refer to any person in which there is partial (10 percent or more) or total ownership or control between the company and any other person.
2. The terms “T-Mobile USA” or “T-Mobile USA, Inc.” mean Deutsche Telekom AG, its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships, and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing. The terms “parents”, “subsidiary,” “affiliate,” and “joint venture” refer to any person in which there is partial (10 percent or more) or total ownership or control between Deutsche Telekom and any other person.
3. The terms “and” and “or” have both conjunctive and disjunctive meanings.
4. The word “any” shall be construed to include the word “all,” and the word “all” shall be construed to include the word “any.” The word “each” shall be construed to include the word “every,” and the word “every” shall be construed to include the word “each.” All words used in the singular should be construed to include the plural, and all words used in the plural should be construed to include the singular.
5. The term “Applicants” means AT&T Inc. and Deutsche Telekom AG, collectively.
6. The term “Application” means the applications submitted by AT&T Inc. and Deutsche Telekom AG on April 21, 2011, with the lead file number for the wireless radio services listed as 0004669383.
7. The term “CDMA” means Code Division Multiple Access technology.
8. The term “CMA” means Cellular Market Area.
9. The term “competitor” includes any actual or potential competition from any partnership, corporation (including a business trust), joint stock company, trust, unincorporated association, joint venture, limited liability company, or other entity in any relevant area for any relevant product.
10. The term “discussing” when used to refer to documents means analyzing, constituting, summarizing, reporting on, considering, recommending, setting forth, or describing a subject. Documents that contain reports, studies, forecasts, analyses, plans, proposals, evaluations, recommendations, directives, procedures, policies, or guidelines regarding a subject should be treated as documents that discuss the subject. However, documents that merely mention or refer to a subject without further elaboration should not be treated as documents that discuss that subject.

11. The term “documents” means all computer files and written, recorded, and graphic materials of every kind in the possession, custody, or control of the Company. The term “documents” includes without limitation drafts of documents, copies of documents that are not identical duplicates of the originals, and copies of documents the originals of which are not in the possession, custody, or control of the Company. The term “documents” includes, without limitation, materials of every kind in the possession, custody, or control of the Company whether created internally or externally. In addition, the term “documents” includes without limitation any amendments, side letters, appendices, or attachments. The term “computer files” includes without limitation information stored in, or accessible through, computer or other information retrieval systems. Thus, the Company should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, mainframes, servers, backup disks and tapes and archive disks and tapes, and other forms of offline storage, whether on or off the Company’s premises. Electronic mail messages should also be provided, even if only available on backup or archive tapes or disks. Computer files shall be printed and produced in hard copy or produced in machine-readable form (provided that Commission staff determine prior to submission that it would be in a format that allows the Commission to use the computer files), together with instruction and all other materials necessary to use or interpret the data. Unless otherwise specified, the term “documents” excludes bills of lading, invoices, purchase orders, customs declarations, and other similar documents of a purely transactional nature and also excludes architectural plans and engineering blueprints. Where more than one identical copy of a requested document exists, the Company shall only submit one representative copy.
12. The term “EDGE” means Enhanced Data rates for GSM Evolution technology.
13. The term “EvDO” or “EvDO Rev. A” means Evolution-Data Optimized or Evolution-Data Optimized Revolution A. technology.
14. The term “GPRS” means General Packet Radio Service technology.
15. The term “GSM” means Global System for Mobile Communications technology.
16. The term “HSPA” or “HSPA+” means High Speed Packet Access or High Speed Packet Access + technology.
17. The term “identify,” when used with reference to a document, means to state the date, author, addressee, type of document (e.g., the types of document, as described above), a brief description of the subject matter, its present or last known location, and its custodian, who must also be identified.
18. The term “including” shall be construed as including, but not limited to, and indicates examples for the Applicants to address. The term should not be construed as to limit the response to only those examples listed.
19. The term “LTE” means Long Term Evolution technology.
20. The term “Merged Company” means AT&T after the Proposed Transaction has been approved and consummated.

21. The term “mobile wireless application,” also referred to as “application software” or “app,” means a computer system that enables one or more function on a mobile wireless device running a mobile operating system (e.g., Android, iOS).
22. The term “mobile wireless telephone number,” means the 10-digit telephone number assigned to an end-user to access mobile wireless services.
23. The term “mobile wireless data services” means any data communications service using radio transmission between mobile or fixed stations and a network providing communication of packet data information, including but not limited to, broadband data, video, remote file access, status reporting, facsimile, and internet/intranet access. Mobile wireless data services include non interconnected Voice over IP but exclude mobile wireless voice and text services, as defined herein.
24. The term “mobile wireless services” includes mobile wireless voice services, mobile wireless text services, mobile wireless data services, and mobile wireless applications.
25. The term “mobile wireless text services” means any communications service using radio transmission between mobile or fixed stations and a network providing communication of numeric or alphanumeric messages, such as multi media messaging, short messaging, and short codes. Mobile wireless text services exclude e-mails.
26. The term “mobile wireless voice services” means interconnected voice communications services provided using radio transmission between mobile or fixed stations on a wireless basis to customers, other than fixed wireless services. Mobile wireless voice services include interconnected Voice over IP.
27. The term “MSA” means Metropolitan Statistical Area.
28. The term “Person” includes the Company, and means any individual, partnership, corporation (including a business trust), joint stock company, trust, unincorporated association, joint venture, limited liability company or other entity, or a government or any political subdivision or agency thereof.
29. The term “plans” means tentative and preliminary proposals, recommendations, or considerations, whether or not finalized or authorized, as well as those that have been adopted.
30. The term “plans, analyses and reports” means business plans, strategic plans, written policies, budgets, analyses, reports, presentations (including quantitative presentations), and similar documents, including all appendices and attachments thereto, prepared for, presented to, reviewed by, discussed by, or considered by the Company’s board of directors or the Company’s executive management, or any member thereof. In the case of T-Mobile USA, the terms board of directors and executive management include the board of directors and executive management of both Deutsche Telekom AG and T-Mobile USA, Inc. The term “plans, analyses and reports” includes without limitation copies of plans, analyses and reports that are not identical duplicates of the originals, and copies of plans, analyses and reports, the originals of which are not in the possession, custody, or control of the Company, but does not include drafts of plans, analyses and reports, but only the final version or the latest draft if the final version does not exist or is not in the possession, custody, or control of the Company.

31. The term "POPs" means total aggregate population.
32. The term "Proposed Transaction" means the proposed acquisition of T-Mobile USA, Inc. by AT&T filed on April 21, 2011, with lead application file number for the wireless radio services listed as 0004669383.
33. The term "Public Interest Statement" refers to the document filed by the Applicants on April 21, 2011 entitled "Description of Transaction, Public Interest Showing, and Related Demonstrations."
34. The term "relevant area" means, and information must be provided separately for, each Cellular Market Area and the United States as a whole (including Puerto Rico).
35. The term "relevant product" means (and information must be provided separately for, any of the mobile wireless services and using any of the following formats: GSM, EDGE, UMTS only, HSPA, HSPA+, and LTE):
 - 1) feature mobile devices: wireless handset devices that are cable of supporting voice services as well as text services;
 - 2) smartphones: wireless handset devices other than iPhones, with advanced computing capability and connectivity sufficient to run complete mobile operating system software (e.g., Android, Research in Motion Ltd. Blackberry, Windows phone) to support all mobile wireless services, including broadband data and video applications as well as voice, photographic cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
 - 3) iPhones: smartphones designed and marketed by Apple Inc.;
 - 4) tablet PCs (includes netbook PCs): portable devices (other than iPads) with touch screen and/or a QWERTY keyboard input, and advanced computing capability and connectivity sufficient to run complete operating system software (e.g., Android, Windows) to support broadband data and video applications as well as photographic, cinematic, and audio-visual media player services (including books, periodicals, movies, music, games);
 - 5) iPads: tablet PCs designed by Apple Inc.;
 - 6) e-readers: portable personal computing devices with a display size of 6" to 10" typically, with advanced computing capability and connectivity sufficient to enable users to shop for, purchase, download, and display text, designed primarily for the purpose of reading books, newspapers, and periodicals;
 - 7) "air cards" (also referred to as "laptop cards"): portable wireless modems that enable personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services;
 - 8) mobile hotspots devices: network routing devices that enable portable, Wi-Fi enabled handset and personal computing devices to connect to a mobile wireless network in order to support and deliver voice, data, and video services; and
 - 9) other mobile wireless devices not listed above. Describe the other devices included in this category.
36. The term "relevant service" means (and information must be provided separately for, any of the services identified below and using any of the following formats: GSM, EDGE, UMTS only, HSPA, HSPA+, and LTE):
 - 1) mobile wireless voice services;

- 2) mobile wireless text services;
 - 3) mobile wireless data services; and
 - 4) mobile wireless applications.
37. The term “RSAs” means Rural Service Areas.
38. The term “sales” means net sales in units or dollars, i.e., total sales after deducting discounts, returns, allowances, and excise taxes. “Sales” includes sales of the relevant service or product whether provided or manufactured by the company itself or purchased from sources outside the company and resold by the company in the same form as purchased.
39. The term “SMS” means short message service.
40. The term “subsidiary” as to any Person means any corporation, partnership, joint venture, limited liability company, or other entity of which shares of stock or other ownership interests having ordinary voting power to elect a majority of the board of directors or other managers of such corporation, partnership, joint venture, limited liability company or other entity are at the time owned, or the management of which is otherwise controlled, directly or indirectly, through one or more intermediaries, or both, by such Person.
41. The term “UMTS” means Universal Mobile Telecommunications System technology.
42. The term "UMTS/HSDPA" means Universal Mobile Telecommunications System/High Speed Downlink Packet Access.
43. “United States” or “U.S.” means the United States, its possessions, territories, and outlying areas.
44. The term “WCDMA” means Wideband Code Division Multiple Access technology.
45. The term “WCS” mean Wireless Communications Service.

Instructions

1. Unless otherwise specified, all Information and Document Requests cover the period from January 1, 2009 through the present.
2. Corporations and other entities, including affiliated or subsidiary entities, shall be identified by the Central Index Key (“CIK”) assigned by the Securities and Exchange Commission (“SEC”). A unique identifier should be used for each entity that has not been assigned a CIK by the SEC.
3. Submit responses to Information Requests in both paper and electronic form, unless an electronic form is specified (*e.g.*, electronic spreadsheet). Submit responses to Document Requests (including materials containing Highly Confidential or Confidential Information) in electronic form only in a manner that is fully compatible with the Commission’s Summation Enterprise software database, as set forth in the Instructions for Submission of Electronic Documents. The Commission does not require the submission of paper copies of these documents at this time, but reserves the right to require their submission at a later time.
4. Each requested document shall be submitted in its entirety, even if only a portion of that document is responsive to a request made herein. This means that the document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other documents referred to in the document or attachments. All written materials necessary to understand any document responsive to these requests shall also be submitted. Provide final versions of each document; however, if a final version does not exist provide one copy of the latest draft of the document.
5. Those documents written in a language other than English must be translated into English; automated or machine translations are not permitted. Submit the foreign language document, with the English translation attached thereto.
6. Unless otherwise specified, provide data and interrogatory responses separately for prepaid, post-paid, wholesale, and all mobile wireless services.
7. Data provided in response to this Request should include a list of all parameters/assumptions on which the data are based.
8. Unless otherwise agreed to by the Commission, requests for the production of documents (and any particular type of document) require the production of all responsive documents in the possession, custody, or control of the Company.
9. For each document or statement submitted in response to the requests, indicate, by number and subsection, the request to which it is responsive and, for documents, identify the Person(s) from whose files the document was retrieved (*i.e.*, custodian). Group submitted materials according to the request number to which they are responsive and then, within each of those request-number groupings, by the appropriate custodian. If a document is responsive to more than one request, submit the document in response to the first request to which it is responsive, and, in accordance with the Instructions for Submission of Electronic Documents below, indicate in the metadata accompanying the document’s electronic record all subsequent requests to which it also is responsive. If any document is not dated, if known, state the date on which it was prepared. If any document does not identify its author(s) or recipient(s), provide, if known, the name(s) of the author(s) or recipient(s) as metadata in accordance with Instructions for Submission of Electronic Documents. The Company must identify with reasonable specificity all documents provided in response to these requests. Where more than one

identical copy of a requested document exists, the Company may submit only one representative copy, but in all cases all metadata, including without limitation all custodians who possessed identical documents withheld, must be provided in accordance with the provisions of Instructions for Submission of Electronic Documents.

10. The specific requests made herein are continuing in nature. The Company is required to produce in the future any and all documents and information that are responsive to the requests made herein but not initially produced at the time, date, and place specified herein. In this regard, the Company must supplement its responses (a) if the Company learns that, in some material respect, the documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive documents or information are acquired by or become known to the Company after the initial production.
11. Any documents that are withheld in whole or in part from production based on a claim of privilege shall be assigned document control numbers (with unique consecutive numbers for each page of each document). For any page of any Document that the Company has designated to be withheld as entirely privileged, the Company shall submit a substitute, placeholder page that lists only the Document ID of the page that was withheld in entirety as privileged and a statement indicating that the page has been withheld in entirety as privileged. For any document withheld as entirely privilege, it is sufficient to supply one substitute, placeholder page for that document, so long as the range of Document IDs for the entire document is listed on the placeholder page and each Document ID for each page of the document is reflected in metadata. The placeholder pages must be OCR'd as any other paper record, as described above. For each document withheld as privileged, whether in entirety or in part, the Company shall code the substitute document submitted as specified in and provide as metadata the information in the attached MetaData Table of Requested Fields.
12. For each Document identified on the Company privilege log:
 - 1) Provide the document control number(s);
 - 2) Identify all authors of the document;
 - 3) Identify all addressees of the document;
 - 4) Identify all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - 5) Provide the date of the document;
 - 6) Provide a description of the subject matter of the document;
 - 7) State the nature or type of the privilege that the Company is asserting for the document (e.g., "attorney-client privilege");
 - 8) Provide the number(s) of the Request to which the document is responsive;
 - 9) Provide the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - 10) State whether the document has been produced in redacted form, and include the range of Document ID labels for those produced documents.
13. The Company's privilege log shall also conform with all of the following requirements:
 - 1) Provide a separate legend identifying each author, addressee, and recipient identified on the Company's privilege log.
 - 2) Identify on the privilege log, and denote with an asterisk, all attorneys acting in a legal capacity with respect to the withheld document or communication.
 - 3) The description of the subject matter of each document shall describe the nature of the document in a manner that, though not revealing information that is itself privileged, provides

sufficiently detailed information to enable the Commission to assess the applicability of the privilege claimed.

- 4) For each document withheld under a claim that it constitutes or contains attorney work product, also state whether the Company asserts that the document was prepared in anticipation of litigation or for trial and, if so, specify the anticipated litigation or trial upon which the assertion is based.
- 5) Produce all nonprivileged portions of any responsive document (including nonprivileged or redactable attachments) for which a claim of privilege is asserted, except where the only nonprivileged information in the document has already been produced. Note where any redactions in the document have been made.
- 6) The privilege log shall be produced in both hardcopy and electronic form, the electronic form of which shall be both searchable and sortable.
- 7) Documents sent solely between counsel, including in-house counsel acting solely in a legal capacity, and documents authored by the Company's outside counsel that were not directly or indirectly furnished to any third party, such as internal law firm memoranda, may be omitted from the privilege log. However, any attachments to such documents must be included on the privilege log (if a privilege is applicable to such materials), unless such attachments are addressed and sent solely to counsel.

Instructions for Submission of Electronic Documents

A. Form of Production

1. Electronic documents shall be produced in Summation Enterprise load files as images and/or native format files with extracted text and related metadata and bibliographic information. A list of metadata fields that must be populated, as relevant, is attached. Specific requirements for different types of documents are discussed below. Please contact Commission staff for further technical specifications.
2. Each submission shall be accompanied by an index, in hard copy and electronic form, detailing what has been produced, by custodian and Bates number, along with information to confirm that the Commission has received everything that you intended to send.
3. To minimize any delay in loading your submissions, each submission shall be as large as practical under these specifications, while also maintaining a timely and rolling production. However, load file volumes shall not contain more than 100,000 records.
4. Subsequent submissions shall not include information produced in previous submissions, unless specifically requested by the Commission.
5. The submission preferably shall be on a portable hard drive or DVD-ROM, depending on the volume, appropriately labeled with the submission(s) contained on the media. The Commission cannot return any submission, nor can it accept productions over the Internet.
6. A web-based, hosted production is not likely to be possible due to technical issues related to the Commission's firewall.

B. Document Types

1. Hard-copy (or paper) documents.
 - (a) Except as otherwise agreed, hard-copy documents shall be produced as image files with related searchable OCR text and bibliographic information.
 - (b) Some documents may more appropriately and efficiently be produced in hard-copy form (*e.g.*, maps).
 - (c) Special care should be taken to properly unitize documents, maintain attachment relationships, and indicate file folder or binder labels, consistent with the Definitions and Instructions.
2. E-mail and Other Electronic Messages.
 - (a) E-mail and other electronic messages (*e.g.*, instant messages (“IMs”)) shall be produced as image files with related searchable text and metadata and bibliographic information.
 - (b) Each IM conversation shall be produced as one document.
 - (c) E-mail metadata shall include the folderpath (“folder” field) information for e-mail file folders into which a custodian's e-mail messages have been organized. Be sure to preserve and produce this information as specified. Beware of copying e-mails into an electronic repository or forwarding

them to a central e-mail box, as such processes may destroy this information. *See also infra* Section C(2) regarding custodian metadata.

(d) Depending on how the Company's systems represent names in e-mail messages or IMs, the Commission may require a table of names or contact lists.

3. Spreadsheets shall be produced in native format (*e.g.*, .XLS files) with the first page imaged and with related searchable text and metadata and bibliographic information.

4. Presentations.

(a) Presentations shall be produced as images that show the full slide images and speaker notes, with related searchable text and metadata and bibliographic information.

(b) Presentations shall also be produced in native format (*e.g.*, .PPT files).

5. Word processing and other electronic documents not specifically addressed elsewhere in this letter shall be produced as image files with related searchable text and metadata and bibliographic information.

6. Databases.

(a) This letter does not address enterprise databases which may be responsive to the Information and Document Requests and should be the subject of a separate discussion once you have identified them.

(b) Smaller databases (*e.g.*, Microsoft Access) that are responsive should be produced, but not as part of the load-file production. Such databases should be produced separately.

7. Company Intranets and Social Networking Sites.

(a) If the Company's intranet or company social networking content (*e.g.*, Facebook, Twitter) contains responsive information, production of these items should be the subject of a separate discussion.

(b) Depending on the nature of the information, it may be appropriate to provide the Commission direct access to the Company's intranet via a secure Internet connection, but significant technical issues are often involved.

8. Embedded files with no substantive content (*e.g.*, corporate logos, executive "head-shot" photographs, stationery address blocks), which would appear in the production as an otherwise blank and therefore unresponsive "TIFF" image, should not be produced.

C. General Issues

1. Attachments and their parent documents are a "family" of documents. Families of documents (*e.g.*, a cover e-mail with multiple attachments) must all be produced in full. If one member of the family is responsive, the entire family is considered responsive, and individual documents in the family cannot be withheld on grounds of being "non-responsive."

2. The required metadata for each electronic document includes “custodian” information (typically, the name of the human person from whose files the document was gathered) and “filepath” information for directory/server folders into which a custodian’s documents have been organized. Ensure that you are collecting this information when collecting responsive documents. If the Company stores documents in a repository that does not maintain personal custodian or filepath information (*e.g.*, that “journals” e-mails), it shall be required to stipulate to custodian identities for purposes of using documents.

3. In certain circumstances, a custodian may be a shared resource (*e.g.*, shared drive or server, shared filing cabinet). Materials gathered from such repositories, to which multiple people have access, shall be produced as separate custodians. The Company shall provide a brief description of each shared resource that includes a list of the employees who have access to that shared resource. The documents in shared resources should otherwise be produced as described in the rest of this letter. (Personal share or server drives are not shared resources and shall be produced as part of each human custodian’s files.)

4. Native Format Files

(a) If any native files will be produced that cannot be viewed using the standard configuration of Microsoft Office 2007, Adobe Acrobat Reader 9, WordPerfect X4, or Internet Explorer 7, you will need to notify the Commission so it can determine whether it has the appropriate software and licenses to view those files. If it does not, it may be necessary for the Company to provide that software.

(b) Any encryption or password protection shall be removed from all native format files produced.

5. Images and Text Files

(a) Images of the produced electronic documents shall conform with any further specifications provided by the Commission.

(b) Searchable OCR and extracted text from the produced electronic documents shall conform with any further specifications provided by the Commission.

(c) Care should be taken to ensure that the text files will properly format and wrap.

(d) If any document cannot be interpreted in image/text format (*e.g.*, color, Microsoft Project), the Commission may request that it be produced natively, or the Company can contact the Commission to discuss producing them natively. As noted above in C(4)(a), the Company may need to provide the appropriate software in order for the Commission to view these documents.

6. Deduplication

(a) The Company shall deduplicate vertically within each custodian’s files.

(b) The Commission prefers that the Company also deduplicate horizontally across all custodians’ files, but only if:

(i) the deduplication methodology preserves information on BCC recipients of e-mail;

(ii) custodian information from suppressed duplicates can be preserved and produced as a custodian append file; and

(iii) the Company, prior to beginning its production, provides a written description its deduplication methodology, including how custodial and BCC information shall be preserved and produced, to which the Commission agrees.

(c) The Company must produce all members of a family of documents (*see* C(1)) and cannot suppress attachments to other documents. In other words, the integrity of families of documents must be maintained, except as limited by any claim of privilege.

(d) The Company agrees not to raise any objections to the Commission's use of the produced duplicate in relation to whether it was in the files of the custodians who had the suppressed duplicates in their files or were the sender or recipients of any e-mail.

7. Privilege Designations

(a) Documents redacted pursuant to any claim of privilege shall be designated "Redacted" in the Properties field in the metadata and bibliographic information provided. The Company shall provide appropriately redacted related searchable text, metadata, and bibliographic information for these documents.

(b) Documents withheld pursuant to any claim of privilege that are part of a document family shall include a designation of "Family Member of Priv Doc" in the Properties field in the metadata and bibliographic information provided for all the other documents in its family. A placeholder image with a Bates number should be provided in place of the document.

(c) Both redacted and withheld documents shall appear on the privilege log. Each withheld document from a family shall include the family Bates number range in its entry on the privilege log.

8. Bates Numbering

(a) A consistent format for Bates numbering shall be used across the entire production. Bates numbers should contain no more than three segments – *e.g.*, a company identifier, a middle segment (*e.g.*, custodian identifier), and a sequence of 6-8 digits (the number of digits should be consistent across the entire production).

(b) Bates numbers should not contain embedded spaces (" "), slashes ("/"), backslashes ("\"), or underscores ("_"). Bates numbers may contain hyphens ("-").

(c) Native format files should be assigned a Bates number; if images have been produced with a native format file, the beginning Bates number of the images should be the native format file's Bates number.

9. These instructions do not address or endorse any search method the Company may use to identify responsive electronic documents.

10. In order to ensure the Company's full technical and procedural compliance with these instructions, the Company shall make its Information Technology personnel and those of its vendors available to Commission staff for consultation and coordination before, during, and after its production of materials responsive to the requests.

D. Sample Submission Required Prior to Full Production

In consultation with Commission staff, the Company shall submit a test submission to ensure proper configuration of data for uploading into the Commission's Summation Enterprise database server before the Company "ramps up" production. To minimize the likelihood of encountering problems during full production, the sample must be representative of an actual production, including multiple types of documents, documents with attachments ("families"), document families from which an item has been removed pursuant to privilege (and replaced with a Bates-numbered, placeholder image), redacted documents with appropriately related searchable text, and presentation documents with speaker notes.

FIELD LISTING FOR SUMMATION METADATA LOAD FILE			TYPE OF RECORD(S) TO WHICH EACH FIELD APPLIES			
Field Name	Field Description	Field Type	Hard Copy	E-Mail	Spreadsheets and Presentations	Other E-Docs (all Attachments, Calendar Appts, Loose Files)
COMPANIES	Company submitting data	Multi-Entry	x	x	x	x
SUBMISSION#	Production volume number (e.g., ABC001)	Note Text	x	x	x	x
REQUEST#	Request(s) to which the document is responsive	Multi-Entry	x	x	x	x
CUSTODIAN	Custodian(s) / source(s) -- format: Last, First or ABC Dept	Multi-Entry	x	x	x	x
BEGDOC#	Start Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names or any character used as a delimiter in the load files as part of this number	Note Text	x	x	x	x
ENDDOC#	End Bates (including prefix) -- do not use commas, underscores, ampersands, slashes, spaces, characters not allowed in Windows file names, or any character used as a delimiter in the load file as part of this number	Note Text	x	x	x	x
DOCID	Must equal the value appearing in the BEGDOC# field	Note Text	x	x	x	x
NUMPAGES	Page count	Integer	x	x	x	x
PARENTID	Parent record's BEGDOC#, including prefix (populated ONLY in child records)	Note Text	x	x	x	x
ATTACHMENTIDS	Child document list: BEGDOC# of each child (populated ONLY in parent records)	Multi-Entry	x	x	x	x
BATESRANGE	BEGDOC# value of the parent record and ENDDOC# value (including prefix) of the last child record (for example, ABC-001 - ABC-020); populated for all documents in the group - otherwise, remains empty	Note Text	x	x	x	x
EPROPERTIES	Indicate All That Apply : <u>Record Type</u> : Loose File, E-mail, Attachment, Hard Copy, Calendar Appt <u>Privilege Notations</u> : Redacted, Privileged, Family Member of Priv Doc	Multi-Entry	x	x	x	x
PRIV	Privileged (Y/N)	Note Text	x	x	x	x
PO1	Subject to First Protective Order (Y/N)	Note Text	x	x	x	x
PO2	Subject to Second Protective Order (Y/N)	Note Text	x	x	x	x
FROM	Author of the e-mail or loose electronic file (as formatted on the original)	Note Text		x	x	x
TO	Recipients of the e-mail (as formatted on the original)	Multi-Entry		x		
CC	Names of the individuals who were copied on the e-mail (as formatted on the original)	Multi-Entry		x		
BCC	Names of the individuals who were blind-copied on the e-mail (as formatted on the original)	Multi-Entry		x		
SUBJECT	E-mail or calendar subject, or electronic file's document title	Note Text		x	x	x
DATESENT	Date the e-mail was sent - YYYYMMDD	Date		x		
TIMESENT	Time e-mail was sent -- HH:MM am/pm (e.g., 09:32 am; Timezone indicators cannot be included)	Time		x		
DATERECEIVED	Date e-mail was received - YYYYMMDD	Date		x		
TIMERECEIVED	Time e-mail was received -- HH:MM am/pm	Time		x		
HEADER	The internet header information for e-mail sent through the internet;	Note Text		x		
INTERNETMSGID	Internet message identification number	Note Text		x		
MESSAGEID	Unique system identification number for the e-mail message	Note Text		x		
DATECREATED	Date electronic file was created - YYYYMMDD	Date			x	x
DATESAVED	Date electronic file was last modified - YYYYMMDD	Date			x	x
DOCDATE	Populate with: DATESAVED for electronic files (loose files and e-mail attachments) ; DATESENT for e-mails; or	Date Keyed	x	x	x	x

	DATEAPPTSTART for calendar appointments - YYYYMMDD					
DATEAPPTSTART	Start date of calendar appointment - YYYYMMDD	Date				x
TIMEAPPTSTART	Start time of calendar appointment - HH:MM am/pm	Time				x
DATEAPPTEND	End date of calendar appointment - YYYYMMDD	Date				x
TIMEAPPTEND	End time of calendar appointment -- HH:MM am/pm	Time				x
FILESIZE	File size (numeric value only - do not include unit of measure)	Integer		x	x	x
ATTACHTITLE	File name of an e-mail, e-mail attachment, or loose electronic document	Note Text		x	x	x
APPLICATION	Application used to create native file (e.g., Excel, Outlook, Word)	Note Text		x	x	x
FILEEXTENSION	File extension of native electronic file	Fixed Length 5 chars		x	x	x
FILEPATH	File path to native file as it existed in original environment	Note Text		x	x	x
DOCLINK	Current file path location to the native file (on the delivery medium)	Note Text			x	
FOLDER	E-mail folder path (sample: Inbox\Active); or Hard Copy folder/binder title/label	Note Text	x	x		
HASHMD5	MD5 hash value (used for deduplication or other processing)	Note Text		x	x	x
HASHSHA	SHA1 hash value (used for deduplication or other processing)	Note Text		x	x	x
SEARCHVALUES	List of search terms used to identify record as responsive (if used)	Multi-Entry	x	x	x	x