FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

June 6, 2011

Via First Class Mail and E-mail

Lawrence R. Krevor
Sprint Nextel Corporation
900 7th Street, N.W.
Washington, D.C. 20001

Regina M. Keeney
Lawler, Metzger, Keeney & Logan, LLC
2001 K Street, N.W.
Suite 802
Washington, D.C. 20006
Counsel for Sprint Nextel Corporation

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

Dear Mr. Krevor and Ms. Keeney:

On April 21, 2011, AT&T Inc. ("AT&T") and Deutsche Telekom AG ("Deutsche Telekom") filed applications pursuant to section 310(d) of the Communications Act of 1934, as amended,[1] seeking Commission consent to the transfer of control of licenses and authorizations held by T-Mobile USA, Inc. ("T-Mobile USA") and its wholly-owned and controlled subsidiaries.[2] In order for the Commission to complete its review of the applications and make the necessary public interest findings under section 310(d) of the Communications Act,[3] we require written responses, supporting documentation, and data, as applicable, for each request set forth in the Attachments from other commercial wireless carriers against which the applicants compete.

Accordingly, pursuant to sections 4(i), 4(j), and 403 of the Act,[4] we request that you provide written responses as set forth in the Attachments. Each response or document should clearly indicate the specific question or request to which it responds, and each page should be marked with a corporate identification and consecutive document control numbers as specified in the attached instructions. Your

[1] 47 U.S.C. § 310(d).

[2] *See* AT&T Inc. and Deutsche Telekom AG Seek FCC Consent to the Transfer of Control of the Licenses and Authorizations Held by T-Mobile USA, Inc. and Its Subsidiaries to AT&T Inc., WT Docket No. 11-65, *Public Notice*, DA 11-799 (rel. Apr. 28, 2011) ("Comment Public Notice").

[3] 47 U.S.C. § 310(d).

[4] 47 U.S.C. §§ 154(i), 154(j), and 403. *See generally FCC v. Schreiber*, 381 U.S. 279 (1965).

response will be treated as confidential pursuant to the Protective Order issued in WT Docket No. 11-65.[5] We would appreciate receiving your response no later than June 20, 2011.

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, in WT Docket No. 11-65. In addition, the Comment Public Notice and the Protective Order require the submission of multiple copies of all *ex parte* and other filings submitted in this proceeding.[6] The Wireless Telecommunications Bureau also should receive, at a minimum, two copies of all paper filings. This requirement does not apply, however, to the submission of documents produced in a form compatible with the Commission's document review software as described in the attached instructions, for which only one electronic copy shall be submitted. If you submit information pursuant to the Protective Order issued in this case, you should deliver to Kathy Harris of the Wireless Telecommunications Bureau two copies of the unredacted documents marked "Confidential Information – Subject to Protective Order in WT Docket No. 11-65 before the Federal Communications Commission" and two copies of the redacted documents marked "Redacted – For Public Inspection."[7] For any electronic filings made using the Commission's Electronic Comment Filing System ("ECFS"), parties also should serve the documents via e-mail to Kathy Harris, kathy.harris@fcc.gov; Kate Matraves, catherine.matraves@fcc.gov; and Jim Bird, jim.bird@fcc.gov.

If you have any questions regarding this matter, please contact Susan Singer, Wireless Telecommunications Bureau, at (202) 418-1340, or Joel Rabinovitz, Office of General Counsel, at (202) 418-0689.

Sincerely,

Ruth Milkman
Chief, Wireless Telecommunications Bureau

Attachments

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[5] Applications of AT&T Inc. and Deutsche Telekom AG For Consent To Assign or Transfer Control of Licenses and Authorizations, WT Docket No. 11-65, *Protective Order*, DA 11-674 (WTB rel. Apr. 14, 2011) ("Protective Order").

[6] *See* Comment Public Notice at 4; Protective Order.

[7] *See* Protective Order at 2 ¶ 3.

WT Docket Number 11-65
INFORMATION AND DISCOVERY REQUEST FOR THIRD PARTIES

1. 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).

2. Provide all plans, analyses, and reports from June 1, 2010 to the present discussing plans for future network deployment.

3. Provide a list, as of the date of this Request, by CMA, of the cell sites owned or shared by the Company (a) the percentage of cell sites collocated each with AT&T and T-Mobile; and (b) the percentage of backhaul facilities co-owned or shared each with AT&T and T-Mobile.

4. Provide the Company's price lists as of the date of this Request. Provide a description of each plan, including all terms and conditions.

5. Describe and provide from January 1, 2010 to the present, all plans, analyses, and reports discussing any potential or actual acquisition, divestiture, joint venture, alliance, or merger of any kind by the Company involving the provision or sale of any relevant product, or any relevant service.

6. Discuss whether your Company faces network spectrum and capacity constraints: within the next year; within the next three years; and within the next five years. Provide for January 1, 2010 to the present all plans, analyses, and reports discussing spectrum and capacity constraints. Identify resolutions the Company considered or is considering to solve any constraints in capacity or to increase capacity to provide any relevant service in any relevant area, including, but not limited to:
   a. acquiring new spectrum;
   b. plans to increase network capacity using existing spectrum, such as by adding cell sites or additional backhaul;
   c. repurposing spectrum, including the transition of subscribers from the repurposed spectrum; and
   d. alternative solutions to any spectrum constraint problems, including upgrading network or customer equipment, or changing prices.

7. For January 1, 2010 to the present, provide all plans, analyses, and reports discussing how the Company views mobile wireless services or products offered by other mobile wireless service providers (including, for example, views about relative competitive position, attitude of current or potential customers, network/service quality, marketing decisions, and device availability).

8. Provide the Company's billing data, including data on plans, subscribers, and additions, as specified in Attachment A.

9. Provide data for the Company's number of subscribers as specified in Attachment B.

Attachment A 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_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 postpaid 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 reselled: 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	numeric	Early termination fee amount	The ETF fee typically required by the service contract (enter zero if no ETF)
16	etf_reduce	0/1 numeric	ETF reduction indicator	Indicator variable for whether the ETF declines over contract period
17	shared	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	national	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_any	numeric	Anytime minutes	The number of anytime minutes included in the plan. If unlimited code as 9999
20	min_peak	numeric	Peak minutes	The number of peak minutes inlcuded in the plan. If unlimited code as 9999
21	peak_hours	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_offpeak	numeric	Offpeak minutes	The number of off-peak (e.g. nights and weekends) minutes included in the plan. If unlimited code as 9999
23	min_mobmob	numeric	Mobile to mobile minutes	The number of mobile to mobile minutes included in the plan. If unlimited code as 9999
24	unlim_onnet	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	unlim_friends	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_anylost	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	min_roam	numeric	Voice roaming minutes	The number of voice roaming minutes included in the plan. If unlimited code as 9999
28	over_roam	numeric	Voice roaming per minute overage rate	The per-minute overage rate for roaming minutes in excess of the minutes included in the plan
29	data	numeric	Number of megabytes in plan	The number of megabytes included in the plan (if any). If unlimted 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	data_name	text string	Data plan name	The name or description of the data plan as used in the billing system
31	smart_data	0/1 numeric	Smartphone data plan	An indicator for whether the data plan is available to smartphone devices: 0=No 1=Yes
32	texts	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	text_name	text string	Text plan name	The name or description of the messaging plan as used in the billing system
34	charge_prime_access	numeric	Monthly charge for primary line	The monthly recurring access charge for the primary line
35	charge_primeline	numeric	Activation fee for primary line	The one time activation fee for the primary line
36	charge_add_access	numeric	Monthly charge per additional line	The monthly recurring access charge per additional line on the account
37	charge_addline	numeric	Activation fee per additional line	The one time activation fee per additional line on the account
38	over_any	numeric	Per-minute anytime overage rate	The per-minute overage rate for anytime minutes in excess of the minutes included in the plan
39	access_text	numeric	Monthly charge for text plan	The monthly recurring charge for the text messages included in the plan
40	over_text	numeric	Per text overage charge	The per-text overage rate for text messages in excess of the text messages included in the plan. If no plan provide a la carte rate
41	access_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 overage charge	The per-megabyte overage rate for data in excess of the megabytes included in the plan. If no plan provide a la carte rate

Billing_Subs.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: 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 of the plan for all services 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

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

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

id	cma	month	year	lines_activeon	lines_activeoff	lines_inactive	lines_iPhone	lines_othersmart	gross_additions	disconnect_vol

disconnect_invol	renewals	avg_lines	arpu	arpu_data	perc_smart	perc_iphone

id	cma	month	year	cpga	cpga_ market	cpga_ equip	cpga_ sub	cpga_ other	total_ discounts	total_ cost	new_ bill	new_ accounts	new_charge_ prime	new_ charge_ add	fica	new_ nonsmart	new_ nonsmart_ price	new_iphones

new_iphone_ price	new_ other smart	new_ other smart_ price	new_idevice	new_idevice_ price

Attachment B 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 Mult 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)

Attachment B Table - Bidding

26	Contract_Value	numeric	Contract Value	Total value for the contract in dollars
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

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

*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

Reason_Loss	Day_Contract_Awarded	Month_Contract_Awarded	Year_Contract_Awarded	Enterprise_HQ_FIPS	Enterprise_HQ_Str	Enterprise_HQ_City	Enterprise_HQ_State

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

Contract_Description	Total_Lines	Month_AddLine_Price	International_Service	Month_Total_Revenue	Month_Voice_Revenue	Month_Text_Revenue	Month_Data_Revenue	Comment

Attachment B 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 postpaid (b) retail prepaid (c) retail data-only plans. As a result, each carrier is required to produce three seaparate .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	Smatphone subscribers	The number of smartphone subscribers in the CMA and month
8	subs_idevice	numeric	Internet device subscribers	The number of internet devices 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 texting) by all subscribers in the CMA
14	rev_voice	numeric	Voice revenues	The total revenues (excluding taxes) from 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 (inlcuding 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 us	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

Subscriber Data

month	year	cma	subs	subs_post	subs_pre	subs_smart	subs_idevice	rev_total	rev_service	rev_equip	rev_other	rev_data	rev_voice	rev_mess	rev_over

Subscriber Data

use_min	use_mb	use_mess	arpu	arpu_mess	arpu_data	adds_gross	adds_net	churn	retentions	retention_costs	cpga	ccpu	cost_revserv

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 term “Company” means Sprint Nextel, 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 term “AT&T” means 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 AT&T and any other person.

3. The terms “T-Mobile USA” or “T-Mobile USA, Inc.” mean Deutsche Telkom 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.

4. The terms “and” and “or” have both conjunctive and disjunctive meanings.

5. 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.

6. The term “CDMA” means Code Division Multiple Access technology.

7. The term “CMA” means Cellular Market Area.

8. 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.

9. 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.

10. 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.

11. The term “EDGE” means Enhanced Data rates for GSM Evolution technology.

12. The term “Ev-DO” or “Ev-DO Rev. A” means Evolution-Data Optimized or Evolution–Data Optimized Revolution A. technology.

13. The term “GPRS" means General Packet Radio Service technology.

14. The term “GSM” means Global System for Mobile Communications technology.

15. The term “HSPA” or “HSPA+” means High Speed Packet Access or High Speed Packet Access + technology.

16. 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.

17. 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.

18. The term “LTE” means Long Term Evolution technology.

19. 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).

20. The term “mobile wireless telephone number,” means the 10-digit telephone number assigned to an end-user to access mobile wireless services.

21. 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.

22. The term “mobile wireless services” includes mobile wireless voice services, mobile wireless text services, mobile wireless data services, and mobile wireless applications.

23. 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.

24. 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.

25. The term “MSA” means Metropolitan Statistical Area.

26. 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.

27. 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.

28. 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. 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.

29. The term “POPs” means total aggregate population.

30. The term “relevant area” means, and <u>information must be provided separately for,</u> each Cellular Market Area and the United States as a whole (including Puerto Rico).

31. The term “relevant product” means (and <u>information must be provided separately for,</u> 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.

32. The term “relevant service” means (and <u>information must be provided separately for,</u> 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.

33. The term “RSAs” means Rural Service Areas.

34. 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.

35. The term “SMS” means short message service.

36. 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.

37. The term “UMTS” means Universal Mobile Telecommunications System technology.

38. The term "UMTS/HSDPA" means Universal Mobile Telecommunications System/High Speed Downlink Packet Access.

39. “United States” or “U.S.” means the United States, its possessions, territories, and outlying areas.

40. The term “WCDMA” means Wideband Code Division Multiple Access technology.

41. 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. 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 : Record Type: Loose File, E-mail, Attachment, Hard Copy, Calendar Appt Privilege Notations: 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