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**REDACTED – FOR PUBLIC INSPECTION**

July 13, 2011

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

**FILED/ACCEPTED**

JUL 13 2011

Federal Communications Commission  
Office of the Secretary

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

Dear Ms. Dortch:

This letter and the enclosures hereto respond to the June 6, 2011 letter (“Request”) from the Wireless Telecommunications Bureau to Verizon Wireless in WT Docket No. 11-65. The Request seeks information and documentation on a number of broad topics, and Verizon Wireless has made a good faith effort to provide the information and documents requested. It is providing a response to Items 1, 2, 3, 5, 6 and 7 today, and will supplement this response once it has completed further research into and compilation of the information requested by Items 4, 8 and 9. Set forth below is the Company’s response to each request.

Certain of these responses include Confidential Information that is not otherwise available from publicly available sources and is subject to protection under FOIA and the Commission’s implementing rules. Accordingly, Verizon Wireless is submitting this Confidential Information pursuant to the Protective Order issued April 14, 2011 (“First Protective Order”) in this docket and has marked these documents as such.<sup>1</sup>

In addition, certain of these responses include Highly Confidential Information that is some of Verizon Wireless’ most sensitive business information, is not available from publicly available sources, has been kept strictly confidential by Verizon Wireless, and is subject to protection under FOIA and the Commission’s implementing rules. The release of this Highly Confidential Information would have a serious negative effect on Verizon Wireless’ business and would place Verizon Wireless at a significant disadvantage in the marketplace and in

<sup>1</sup> *Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 11-65, *Protective Order*, DA 11-674 (rel. June 22, 2011) (“First Protective Order”).

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negotiations. Accordingly, Verizon Wireless is submitting this Highly Confidential Information pursuant to the Second Protective Order (Revised) issued June 22, 2011 (“Second Protective Order”) in this docket and has marked these documents as such.<sup>2</sup>

**Request 1.** Verizon Wireless is providing seven coverage maps in shapefile format showing its GSM, 1x CDMA, Ev-DO, and LTE networks in the cellular, PCS, and 700 MHz bands. These maps are being produced under the First Protective Order.

**Request 2.** Documents responsive to this request are attached at VZW0000001 to VZW0000223. These documents are being produced under the Second Protective Order.

**Request 3.** For purposes of subsection (a), Verizon Wireless is providing an excel spreadsheet that lists, for each county, the number of cellsites owned by Verizon Wireless on which the Company leases space to AT&T and/or T-Mobile, and the number of sites on which the Company leases space from ATT or T-Mobile. For purposes of subsection (b), Verizon Wireless has defined “backhaul facility” to mean any circuit (*e.g.*, DS1, DS3) connecting a Verizon Wireless cell site to another point in Verizon Wireless’ network, which typically will be either another cell site or the Mobile Termination Switching Office (“MTSO”). Verizon Wireless, therefore, is providing an excel spreadsheet that lists, for each county, the number and percentage of circuits that Verizon Wireless leases from AT&T or T-Mobile. Verizon Wireless does not lease circuits to either AT&T or T-Mobile. This information is being produced under the Second Protective Order.

**Request 5.** Documents responsive to this request are attached at VZW0000224 to VZW0000346. Certain of these documents are being produced under the First Protective Order.

**Request 6.** Documents responsive to this request are attached at VZW0000109 to VZW0000223 and VZW0000347 to VZW0000798. These documents are being produced under the Second Protective Order. In further response to Request 6, Verizon Wireless notes as follows: Given the rapidly increasing demand for wireless services across the nation, and the explosion in demand for spectrum-intensive broadband internet services in particular, securing access to the spectrum needed to meet those increasing demands is essential to the continued growth and success of the wireless industry. Verizon Wireless is constantly evaluating its need for spectrum both short term and longer term. Projecting the amount of spectrum needed to address future spectrum constraints does not depend only on the particular time frame (such as one year, three years and five years), but on many additional factors. These include: the particular communities or geographic areas involved; the physical characteristics of specific spectrum bands (frequency block, band width, presence of any incumbent users, guard band considerations); FCC technical regulations (height and power limits); projections as to the mix of voice and data services and the evolution of those services (*e.g.*, VoIP and location-based

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<sup>2</sup> *Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*, WT Docket No. 11-65, *Second Protective Order (Revised)*, DA 11-1100 (rel. June 22, 2011) (“Second Protective Order”).

services); the types of applications customers are expected to download and use; and the capabilities of wireless smartphones, tablets and other devices.

Verizon Wireless seeks to maintain a spectrum position that meets the needs of its business both short and long term. Where it determines, based on factors including those identified above, that it may need additional spectrum, it considers each of the solutions identified in Question 6 – namely, acquiring new spectrum, increasing network capacity using existing spectrum such as by adding cell sites and expanding backhaul, repurposing spectrum, and upgrading network equipment. Verizon Wireless also considers many additional solutions, each of which it has used at various times and in various areas, including the following: deploying more spectrally efficient technologies such as EV-DO and LTE, moving traffic among available spectrum blocks, deploying other techniques to manage data traffic such as optimization, and modifying the design of the network through frequency reuse techniques such as antenna sectorization, cell splitting, picocells and femtocells.

Verizon Wireless has described how it manages its spectrum resources and addresses its need for additional spectrum in numerous filings with the Commission, including the following:

1. *International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, Broadband Plan Public Notice #6*, GN Docket Nos. 09-47 et al, Comments of Verizon Wireless on Spectrum for Broadband, filed October 23, 2009.
2. *FCC Broadband Workshop on Spectrum*, September 17, 2009, Testimony of Bill Stone, Executive Director – network Strategy for Verizon Wireless, available at [http://www.broadband.gov/ws\\_spectrum.html](http://www.broadband.gov/ws_spectrum.html).
3. *Fostering Innovation and Investment in the Wireless Communications Market*, GN Docket No. 09-157, Comments of Verizon Wireless, September 30, 2009, at 93-102).

**Request 7.** Documents responsive to this request are attached at VZW0000793 to VZW0001510. These documents are being produced under the Second Protective Order.

Please contact the undersigned if you have any questions.

Sincerely,



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

DOCKET NO.

11-665

**DOCUMENT OFF-LINE**

This page has been substituted for one of the following:

o This document is confidential (**NOT FOR PUBLIC INSPECTION**)

o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

o Microfilm, microform, certain photographs or videotape.

o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12<sup>th</sup> Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

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