

July 19, 2011

**BY ECFS**

Marlene H. Dortch, Esq.  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations*  
WT Dkt No. 11-65, Request for Supplement to Second Protective Order

Dear Ms. Dortch:

Per the Staff's request, AT&T Inc. ("AT&T") anticipates filing additional materials in the above-referenced docket that will include its especially competitively sensitive information. Specifically, AT&T expects that the especially competitively sensitive information will fall within the categories for which the Commission already has limited access to Outside Counsel of Record, Outside Consultants, and Outside Counsel's and Outside Consultants' employees pursuant to the Second Protective Order (Revised) in this proceeding.<sup>1</sup> A non-exhaustive list of examples of such information includes changes in subscriber numbers, churn data, marginal revenue data, and analyses of competitors.

AT&T understands Appendix A to the Second Protective Order (Revised) to cover any especially competitively sensitive information that falls within the categories listed in that appendix regardless of the nature of the filing in which such information is submitted into the record. Nevertheless, out of an abundance of caution, AT&T requests that it and the other parties to this proceeding may designate as Highly Confidential additional especially competitively sensitive information within the categories listed in Appendix A to the Second Protective Order (Revised) (and any future version of Appendix A).<sup>2</sup>

---

<sup>1</sup> *Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer of Control of Licenses and Authorizations*, WT Dkt No. 11-65, Second Protective Order (Revised), DA 11-1100, app. A (rel. June 22, 2011) ("Second Protective Order (Revised)"). Capitalized terms not defined herein take their meanings from the Second Protective Order (Revised).

<sup>2</sup> AT&T recognizes that a request, pursuant to Paragraph 3 of the Second Protective Order (Revised), remains a prerequisite to designating as Highly Confidential any information that does

---

# ARNOLD & PORTER LLP

---

Marlene H. Dortch, Esq.  
July 19, 2011  
Page Two

Please contact me should you have any questions.

Respectfully submitted,



Peter J. Schildkraut  
Counsel for AT&T Inc.

cc (via email): Kathy Harris, Esq.  
Ms. Susan Singer  
Ms. Kate Matraves  
Jim Bird, Esq.  
Neil Dellar, Esq.  
Virginia Metallo, Esq.  
Joel Rabinovitz, Esq.  
Best Copy and Printing, Inc.

---

Footnote continued from previous page  
not fall within the categories listed in Appendix A (as such Appendix may exist at the time of designation).