



Federal Communications Commission
Washington, D.C. 20554

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Washington, DC 20006
Counsel for Sprint Nextel Corporation

Re: Applications of Sprint and SoftBank, IB Docket No. 12-343

Dear Mr. Feore and Ms. Keeney:

We request further information in order to evaluate the petition for declaratory ruling under Section 310(b)(4) filed on behalf of SoftBank and Sprint Nextel in this proceeding (ISP-PDR-20121115-00006). We ask that you provide the following information, which relates to three categories of SoftBank's shareholders (as set out in the petition at Attachment A) and to Sprint Nextel's public shareholders (as set out in the petition at pages 5-6).

1. "Japanese Residents" (47.25% of SoftBank's shares):

- Under the category "Japanese Residents," what percentage of SoftBank's shares are held by individuals? The application states that, when citizenship information was not otherwise available for individual shareholders, Japan Shareholder Services, Ltd. (JSS) used the underlying shareholder addresses provided by beneficial owners to determine citizenship. What percentage of the company's shares are held by individuals for which JSS used address of record information to establish the shareholder's citizenship?
- Also under the category "Japanese Residents," what percentage of SoftBank's shares are held by business entities? Did JSS use address of record information to determine the citizenship of some or all of the business entities in this category and, if so, what percentage of the company's shares are held by such business entities? To the extent that JSS did not use address of record information for some or all of the business entities in this category, what criteria did JSS use to determine an entity's citizenship?

2. "Non-Japanese Residents: Foreign Corporations Outside of Japan Other Than ADR Holders" (35.35% of SoftBank's shares):

- Did JSS use address of record information to determine the citizenship of some or all of the business entities in this category, and, if so, what percentage of the company's shares are held by such business entities? To the extent that JSS did not use address of record information for some or all of the business entities in this category, what criteria did JSS use to determine an entity's citizenship?

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3. "Japanese Trust Banks" (15.83% of SoftBank's Shares):

- Are the trust banks ultimately owned and controlled by Japanese citizens?
- In what capacity do the trust banks hold SoftBank shares (for example, as trustee with sole voting power; as trustee with shared voting power)? To the extent the trust banks hold SoftBank shares for which another person or entity has sole or shared voting power, what criteria did JSS use to determine citizenship of that person or entity?
- To the extent that other persons or entities hold the beneficial ownership interests (i.e., the pecuniary interests) in the SoftBank shares, what criteria did JSS use to determine citizenship of the beneficial owners?
- Please confirm that, in classifying the trust bank holdings in SoftBank as WTO or non-WTO, JSS considered the citizenship of persons or entities hold the voting interests and the equity interests in the SoftBank shares.

4. Sprint Nextel's Public Shareholders:

- Please provide a copy of the Thompson Reuters study (petition, n.11), or provide us with more specific information on the methodology used. We would like to know, based on this methodology, what percentage of non-U.S. shareholders are individuals and what percentage are business entities. For individuals, did Thompson Reuters rely on address of record to determine citizenship? For business entities, what criteria did Thompson Reuters use to determine citizenship?

Please file your response in IB Docket No. 12-343, via ECFS, and in IBFS File No. ISP-PDR-20121115-00006, via IBFS. In addition, please provide a courtesy copy via email to Kathleen Collins at Kathleen.Collins@fcc.gov and David Krech at David.Krech@fcc.gov. If you have questions about our request, please contact David Krech at (202) 418-7443 or Kathleen Collins at (202) 418-1474.

Sincerely,



James L. Ball
Chief, Policy Division
International Bureau