

WT Docket 13-193
INFORMATION AND DISCOVERY REQUEST FOR AT&T

1. Provide a current organization chart and personnel directory 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.
2. Provide, as of the date of this request, a csv format list, by county in each relevant area, of each spectrum license that can be used in the provision of mobile wireless services that the Company holds, leases, has an interest in through a joint venture or other business arrangement, manages, plans to sell, has contracted to acquire, or is in negotiations to acquire. For each license, identify the: (a) FIPS Code; (b) county; (c) state; (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 or planned (*e.g.*, GSM, EDGE, CDMA, EV-DO, EV-DO Rev. A, UMTS, HSPA, HSPA+, LTE); and (j) whether the Company: (i) holds; (ii) has an interest in through a joint venture or other business arrangement; (iii) leases to or from another person; (iv) manages; (v) plans to sell; (vi) has contracted to acquire; or (vii) is in negotiations to acquire.
3. Provide, as of the date of this Request, polygons in an ESRI shapefile format representing geographic coverage in each relevant area for each mobile broadband network technology (*e.g.*, GSM, EDGE, CDMA, EV-DO, EV-DO Rev. A, UMTS, HSPA, HSPA+, LTE) deployed in each frequency band (*e.g.*, 700 MHz, Cellular, AWS-1, PCS, BRS/EBS). Provide all assumptions, methodology (*e.g.*, propagation, projection, field measurements), calculations (including link budgets), tools (*e.g.*, predictive and field measurements) and data (*e.g.*, terrain, morphology, buildings) used in the production of the polygons, and identify the propagation tool used, the propagation model used within that tool, including but not limited to, the coefficients used in the model and any additions, corrections or modifications made to the model.
4. Provide all merger simulations, econometric modeling, or similar analyses, including those regarding market concentration or pricing, 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.
5. Provide full and complete copies of the merger agreement and any side or letter agreements or other related agreements (and all amendments and attachments) that AT&T and Leap have entered into that relate to the Proposed Transaction.
6. Provide all presentations to management committees, executive committees, boards of directors, investors, investor analysts, and industry analysts concerning the Proposed Transaction, including but not limited to the effect of the Proposed Transaction on AT&T's spectrum needs and business plans.
7. Provide all documents discussing the valuation of Leap's assets and AT&T's decision to acquire Leap, including but not limited to, documents discussing the LTE Roaming Agreement and the License Purchase Agreement for the Specified Assets (the so-called "Sunrise" market spectrum) discussed in Section 8.5(c) of the Agreement and Plan of Merger between Leap Wireless International Inc., AT&T Inc., Laser, Inc., and Mariner Acquisition Sub Inc., dated as of July 12, 2013.
8. The Applicants state, "As a condition to AT&T's obligation to consummate the merger, Leap is required to dispose of its ownership interests in PR Wireless, LLC and Flat Wireless, LLC, in which case such interests would not be acquired by AT&T." (Public Interest Statement, page 2, n. 7).

Provide a detailed description explaining this condition and provide all documents discussing this condition. Provide all documents discussing this condition and any correspondence with these entities concerning this condition, and provide all documents and agreements relating to Leap's interests in these entities and any other person.

9. Explain in detail, and provide documents sufficient to support this explanation, the contingent value right ("CVR") relating to the Lower 700 MHz A Block license in Chicago ("Chicago License"). Include in your explanation (a) the reasons for the CVR, (b) its intended purpose, (c) the anticipated process to sell the Chicago License and AT&T's involvement therein, (d) the specific responsibilities of the stockholders' representative and how the stockholders' representative will exercise *de facto* control over the license, (e) the effect on AT&T of holding the Chicago License in this subsidiary on AT&T's rights and obligations, and (f) AT&T's rights to sell the Chicago License and the proceeds of any such sale in the event the shareholders' representative fails to sell the Chicago License under the terms of the CVR. Provide all agreements and documents relating to the creation and operation of the CVR.
10. Provide all plans, analyses, and reports discussing the Company's or any other person's pre-transaction and post-transaction plans relating to any relevant service, or relevant product, including, but not limited to, business plans; short-term and long-range strategies and objectives; budgets and financial projections; presentations to management committees, executive committees, and boards of directors; expansion plans; research and development efforts; plans to reduce costs, to improve services or products, to improve service quality, to improve capacity to transmit mobile wireless services, or to introduce new services or products, including but not limited to, the deployment of LTE (utilizing AWS-1 spectrum and/or PCS spectrum), any plans to offer, after the closing of the Proposed Transaction, to postpaid and prepaid customers AT&T's LTE and HSPA+ data services with different terms (*e.g.*, speed of service, data throttling), and whether, as a result of the Proposed Transaction, prepaid customers would be offered LTE service at the same data rates as AT&T postpaid subscribers. For regularly prepared budgets and financial projections, AT&T need only submit one copy of final year-end documents for 2011 and 2012 and cumulative year-to-date documents for 2013.
11. The Applicants contend that Leap is currently using "about 42 percent of its spectrum in the markets in which it offers facilities-based service." (Public Interest Statement, page 14). The Applicants assert that in the areas where AT&T currently anticipates it will already be utilizing AWS-1 spectrum for LTE service at the time of closing, AT&T "preliminarily has determined that it will be able to deploy Leap's unused, contiguous AWS spectrum in as little as 60 to 90 days." AT&T also estimates that "it will be able to deploy the unused, contiguous Leap spectrum in many additional areas within 12 months after the close of this transaction." (Public Interest Statement, page 15). Further, AT&T asserts that "the AWS and PCS spectrum to be transferred here can be readily integrated into AT&T's LTE network." (Public Interest Statement, page 15).
 - a. Describe the methodology used to determine that Leap is currently using 42 percent of its spectrum, and provide documents sufficient to show the application of that methodology.
 - b. Provide a complete list of CMAs in which AT&T expects to deploy Leap's contiguous AWS-1 spectrum for LTE service in as little as 60-90 days after closing. Provide a detailed explanation of the steps that AT&T would take to deploy this spectrum in the stated timeframe. Further, provide all plans, analyses, and reports relating to this deployment.
 - c. Provide a complete list of CMAs in which AT&T expects to deploy Leap's contiguous spectrum for LTE service within 12 months after closing, and identify the type and band of spectrum that will be deployed in each CMA. Provide a detailed explanation of the steps that AT&T would take to deploy this spectrum in that stated timeframe. In addition, provide all plans, analyses, and reports relating to this deployment.

- d. Provide a complete list of CMAs in which AT&T plans to deploy Leap's PCS spectrum for LTE service. Provide a detailed explanation of the steps that AT&T would take to deploy this spectrum, including the expected timeframe. Further, provide all plans, analyses, and reports relating to this deployment.
 - e. For each relevant area, explain in detail and provide all documents discussing, how AT&T's planned utilization of Leap's AWS-1 and PCS spectrum is superior for AT&T's LTE deployment, compared to any other spectrum considered by AT&T.
 - f. Describe in detail how the availability of backhaul services affects AT&T's ability to provide LTE at a particular rate of speed, and identify each CMA where AT&T plans to use spectrum acquired from Leap to support LTE and where AT&T anticipates backhaul services to support LTE at a desired rate of speed will be unavailable.
12. The Applicants maintain that AT&T would be able to "refarm Leap spectrum into AT&T's LTE network even before the full customer migration and network integration is completed." (Public Interest Statement, page 16). The Applicants further assert that the remaining Leap spectrum would be available for redeployment on AT&T's LTE network "shortly after AT&T completes the migration of Leap customers to AT&T's networks, which is expected within 18 months." (Public Interest Statement, page 16).
- a. Describe in detail, provide a timeline, and provide all plans, analyses, and reports, explaining AT&T's plans to refarm Leap's AWS-1 and PCS spectrum into AT&T's LTE network, specifically addressing how refarming will be accomplished before, during, and after full customer migration and network integration.
 - b. Provide a detailed explanation of AT&T's plans for Leap's LTE network and provide documents sufficient to support this explanation.
 - c. For each relevant market, provide all plans, analyses, and reports, including any documentation, methodologies, and assumptions used in any underlying models, discussing the implementation and buildout of AT&T's LTE network and proposed LTE service, plans, devices and roaming plans: (1) absent the Proposed Transaction; and (2) with the Proposed Transaction.
13. The Applicants assert that the Proposed Transaction would allow "more efficient use of the Leap spectrum than was possible on the Leap network." (Public Interest Statement, page 16). The Applicants contend that Leap's spectrum would allow AT&T to deploy LTE services in "larger, more robust, contiguous 10x10 MHz (or greater) blocks of spectrum and put the spectrum to "efficient and intensive use." (Public Interest Statement, pages 13, 17).
- a. Explain and describe in detail how contiguous spectrum in the relevant markets enables more spectrally efficient deployments, including but not limited to, any analyses comparing the spectral efficiency, user performance, and capacity characteristics of a 5x5 megahertz LTE deployment with a 10x10 megahertz LTE deployment for existing cell site types and locations, spectrum and specific peak hour demand. Provide all documents relied on in preparing the response.
 - b. Explain and describe in detail how non-contiguous spectrum in both the AWS-1 and PCS bands could improve spectrum utilization based on AT&T's current and planned site configuration, network configuration, user equipment offerings and technology evolution for both HSPA+ and LTE technologies.
 - c. Provide all plans, analyses, and reports, including any documentation, methodologies, underlying spreadsheets, and assumptions used in any underlying models, discussing how Leap's network assets would be complementary to AT&T's network and would result in improved network experience for AT&T and Leap customers.

14. Provide all plans, analyses, and reports, and any underlying spreadsheets, which relate to or discuss problems or difficulties providing any relevant service in any relevant areas including, but not limited to:
 - a. spectrum utilization and efficiency;
 - b. how AT&T 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;
 - c. AT&T's estimates of the spectrum required to support each relevant service and projections of when AT&T will exhaust its available spectrum in each relevant area;
 - d. any spectrum capacity constraints AT&T is currently facing or the Company is projected to face in the future;
 - e. dropped and/or blocked calls;
 - f. speed and other quality measures of data services;
 - g. the amount of spectrum needed for the Company to provide mobile wireless services for each technology deployed in the AT&T network;
 - h. the impact the availability of backhaul services has on AT&T's ability to provide data services at a particular rate of speed; and
 - i. repurposing spectrum, including the transition of subscribers from the repurposed spectrum; and alternative solutions to any spectrum constraint problems, including enhanced network or user equipment features, changing prices, or use of small cells or other network reconfiguration options.

15. The Applicants assert that "AT&T expects that many Leap customers can be seamlessly migrated to AT&T's network as they select their new devices" and that "as AT&T learns more about Leap's customer base, it may formulate offers designed to further encourage Leap's customers to migrate to AT&T's network within 18 months of merger close." (Applicants Aug. 20 Amendment, pages 2-3).
 - a. Describe in detail AT&T's plans to migrate current Leap customers to AT&T, including:
 - i. any plans relating to AT&T's expectation that "many Leap customers can be seamlessly migrated to AT&T's network as they select their new devices, and the length of time Leap's current customers would be able to use their existing devices after the closing of the Proposed Transaction";
 - ii. any plans to "formulate offers designed to further encourage Leap's customers to AT&T's network within 18 months of merger close";
 - iii. any plans for relevant services and devices to be offered to Leap's current customers, including but not limited to (a) a detailed description of AT&T's plans to provide Leap's customers with devices that can be used on AT&T's network and any associated charges to a Leap customer who is required to acquire such a device, and (b) the data rates, service plans and pricing to be offered to Leap's customers, specifically identifying the rate plans that will appeal to value conscious customers; and
 - iv. any plans for Leap's customers to retain their current service plans and if so, the length of time existing Leap customers can remain enrolled under their existing service plans, and the period during which new Leap customers would be able to select one of Leap's current service plans after the closing of the Proposed Transaction. Include in your explanation a detailed discussion of all the different types of prepaid/no-contract plans (*e.g.*, daily, monthly all-you-can-eat, and pay as you go) currently available to Leap's customers.
 - b. Describe in detail the transition of Leap's existing customers, including
 - i. a projected timeline for the transition of all of Leap's customers;
 - ii. how Lifeline customers would be transitioned;

- iii. how Muve Music customers would be transitioned and whether the service would continue to be offered; and
 - iv. the transition of Leap's customers enrolled under the MVNO arrangement with Sprint.
 - c. Provide all plans, analyses, and reports discussing customer migration and transition of Leap's current customers to AT&T.
 - d. Identify all CMAs where Leap has ETC status on tribal lands. Describe in detail AT&T's plans for allowing those customers to continue participating in the Lifeline program after the transaction.
 - e. For each handset that would be offered to Leap's customers after the closing of the Proposed Transaction, provide a description of the features of that handset and the services (*e.g.*, HSPA+, LTE) supported by that handset.
16. The Applicants state that "AT&T generally has not aimed to match the offerings of prepaid/no-contract companies such as Cricket and others," although they also state that "AT&T has been marketing prepaid services under the 'AT&T GoPhone' brand for many years" and "recently launched standalone prepaid brand called 'Aio Wireless.'" (Public Interest Statement, page 12). The Applicants contend that by combining "Leap's established Cricket brand . . . with AT&T's nationwide 4G LTE/HSPA+ network, advanced devices and services, and financial resources, the combined company more quickly will bring customers nationwide a higher-quality, more robust, and competitive prepaid offering." (Public Interest Statement, pages 12-13).
- a. Explain in detail and provide documents sufficient to support your explanation, of AT&T's post-transaction plans to achieve such prepaid/no-contract offerings that would "bring customers nationwide a higher-quality, more robust, and competitive prepaid offering." Include in your response the details regarding the different types of prepaid offerings (*e.g.*, daily, monthly all-inclusive, and pay-as-you-go). Provide a detailed description of the Company's plans for GoPhone and Aio Wireless.
 - b. Provide all documents discussing the development of new prepaid mobile wireless service offerings, or the expansion, improvement or reduction of existing prepaid mobile wireless service offerings, or any other changes to the company's current prepaid mobile wireless services offerings (sold under the GoPhone and Aio Wireless brands), including but not limited to, brand development or elimination, retail expansion and distribution, promotions, and device offerings.
 - c. Explain in detail and provide documents sufficient to support your explanation, AT&T's plans after the closing of the Proposed Transaction, to integrate Leap's Cricket brand, with AT&T's current and future prepaid mobile wireless services, including any plans to expand the Cricket brand into any new geographic areas.
 - d. Provide all plans, analyses, and reports discussing how the combined company would compete with other mobile wireless services providers, including, but not limited to, prepaid advertising plans and strategies, prepaid service plans and promotions, and devices offered under both the AT&T and the Cricket brands.
17. Provide all plans, analyses, and reports discussing AT&T's pricing decisions for any relevant service in any relevant market and the United States as a whole, including, but not limited to discussions of: (1) pricing plans; (2) pricing policies; (3) pricing forecasts; (4) pricing strategies; (5) pricing analysis; (6) introduction of new pricing plans or promotions, including local promotions and their determinants and expected or actual impact; (7) tiered pricing, including its relationship to data forecasts and profitability and expected or actual impact; and (8) pricing decisions relating to each relevant service and relevant product.

18. Provide all plans, analyses, and reports (including any surveys conducted by AT&T or any third party) discussing how customers view and value AT&T's network quality, service plans, pricing, and promotions (including local promotions), including any changes by competitors as a result of service offerings by AT&T, and any contemplated or actual competitive changes to AT&T's service plans, pricing, or promotions as a response to other service providers' offerings.
19. Provide all documents discussing AT&T's analysis of, response to, or competitive positioning of AT&T and other mobile wireless service providers in the provision of each relevant service or relevant product in each relevant area, including but not limited to, discussions of perceptions of customer service, spectrum holdings, network quality, offering services at a particular rate, the impact of not offering particular wireless services or devices, the entry of a new wireless service provider, the introduction by a rival service provider of any new relevant product or relevant service (such as Wi-Fi, VoIP, or access to Hotspots), roaming, and the ability to use products internationally.
20. The Applicants assert that "Leap generally has only a modest presence even in the areas where it does offer facilities-based service" and that "AT&T and Leap are not close competitors." (Public Interest Statement, page 32). Dr. Israel contends that "Leap customers are 'unlikely to prefer the nationwide providers' like AT&T, this means that the potential for substitution from Leap to AT&T is not likely to be large." (Public Interest Statement, Israel Declaration, ¶ 24). Provide all documents that Dr. Israel relied on to make statements concerning Leap and its competitors, and in particular, AT&T and Leap as competitors.
21. Provide all documents relating to the loss of customers to other mobile wireless services providers and any attempts to win customers from other mobile wireless services providers or stem losses of customers, including but not limited to:
 - i. churn data and any analyses or reports thereof, including but not limited to, analyses on the correlation of churn with quality, length of contract commitments, and price or other factors;
 - ii. data or studies indicating that a customer left the company or switched to the company because of pricing, network quality, customer service, or the absence or availability of particular services or devices (including, but not limited to, figures on subscribers lost or gained); and
 - iii. documents relating to AT&T's experience or success in obtaining customers through marketing or promotions targeted at particular mobile wireless services providers, particular geographic areas, particular demographic groups, or particular wireless devices, or types of customers (including but not limited to, the offers made and the amount spent on the marketing effort, the number of new subscribers gained, average churn rates for such subscribers and revenue realized by the company).
22. The Applicants contend that the Proposed Transaction would result in "significant savings in network and operating costs and other synergies." (Public Interest Statement, page 7).
 - a. Describe in detail all of the claimed savings and synergies that are projected by the Applicants to result from the Proposed Transaction.
 - b. Provide all plans, analyses, and reports, models, assumptions, and spreadsheets, relating to the estimates of savings in network and operating costs and all synergies referred to in the Applicants' filings in the record, including all documents discussing the projected impact of the synergies on employment after the closing of the Proposed Transaction.
 - c. In particular, describe in detail, and provide all documents relating to, how the Applicants plan to achieve "substantial savings" in customer support functions, while maintaining a "high level of support."
 - d. 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 AT&T anticipates taking to achieve that operational savings or cost synergy, and the estimated time and costs required to achieve it.
- e. For each cost saving, state whether it is a fixed cost saving or a variable cost saving and explain the reasoning. State separately the one-time fixed cost savings, recurring fixed cost savings, and variable cost savings (in dollars per subscriber and dollars per year).
23. The Applicants assert that the integration of Leap's spectrum would result in "greater spectral efficiencies, including improvements in throughput speeds, peak data rates, and latency." (Public Interest Statement, page 18). The Applicants maintain that "[m]any of Leap's cell sites will be productively integrated into our network to increase capacity." (Public Interest Statement, page 8). In Mr. Hogg's Declaration, he contends that network performance would improve for both companies. (Hogg Declaration, ¶ 10).
- a. Explain and describe in detail how AT&T would be able to integrate many existing Leap cell sites into its network, resulting in the claimed benefits for both companies as described in the record. Include the estimated net cost savings of decommissioning any redundant cell sites and any expected impact from the recent cell-tower transaction with Crown Castle International Corp.
- b. Describe in detail and provide all plans, analyses, reports, models, and methodologies relating to the integration by AT&T of Leap's spectrum that would result in "greater spectral efficiencies," including current and projected performance, upload and download speed, latency, and deployment configuration.
- c. Provide all plans, analyses, and reports discussing how the combined company would integrate networks, technologies, switching facilities, and cell sites. Identify the Leap cell sites to be integrated into the AT&T network, including the criteria to be used to consolidate cell sites and a timeline for the integration, and identify, by CMA, the number and location of the cell sites that the combined company would own, share, or decommission.
24. Provide all documents discussing any Leap CDMA or LTE roaming or buildout agreement in any relevant area, including all documents discussing AT&T's plans to renew, extend, or cancel these agreements. Explain AT&T's plans relating to these agreements, including whether, and for how long, the company would honor these agreements. Discuss any penalties that would occur if these contracts were cancelled. Explain whether: (1) AT&T will provide CDMA roaming services at the current rates, terms, and conditions until Leap's CDMA network is shut down; (2) AT&T has any plans to raise roaming rates or change other terms and conditions prior to shutting down Leap's CDMA network; and (3) whether AT&T plans to renew, extend, or sign new roaming agreements prior to shutting down Leap's CDMA network.
25. Provide the Company's data as specified in Attachment A, which includes data on subscribers, handsets, plans, porting, revenue, sites, deployment, and traffic.
26. For the dates January 1 and July 1 in the years 2011, 2012, and 2013, and for each brand under which AT&T sells mobile wireless services, identify the ten best-selling mobile wireless services pricing plans for the United States as a whole, as measured by subscribers. For each pricing plan identified, state the number of total subscribers to each plan and the number of new subscribers added in the prior six months, and describe the price of and all features and services encompassed in the plan, including but not limited to, the number of included minutes and data services, whether mobile wireless services can be shared with others, any promotions offered to attract new subscribers to the plan, and any charges for usage in excess of the maximum allowed under the plan. Additionally, identify by line number, the place where data on each plan identified is provided in response to Request 25 above.

27. Provide all documents relied upon or referred to by Mr. Hogg, Mr. Hutcheson, Mr. Moore, and Mr. Strickland in making the statements contained in their Declarations submitted to the Commission in connection with the Proposed Transaction. In addition, provide all documents provided to, reviewed by, relied upon, or referred to by Dr. Israel in making the statements contained in his Declarations submitted to the Commission in connection with the Proposed Transaction.

Format of Data

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", "Leap Wireless").

Column entries in **bold red** indicate that the party should enter only one of the possible entries listed for that column. No other entries should be entered.

Data for all of the tables should be submitted on a periodic basis as specified in the instructions in individual tables.

"Subs Data" Table

For each month beginning 01/01/2011 and extending through 09/30/2013, please provide subscriber data requested in the "Subs Data" table. In general, this table is intended to provide data on the number of subscribers (subs) by CMA, business unit, and service type.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The month for which the data is being collected.
B	CMA	Number - Integer	1 to 734	This field represents the standard market number of the CMA in which subs are located.
C	Business Unit	Text	"AT&T Wireless", "GoPhone", "Aio Wireless", "MVNO", "Total", etc.	This field represents the business unit, subsidiary, or brand which carries the handset. Applicants should provide data for each business unit separately as well as for the total across all business units. Entries aggregating total data should be labeled "Total."
D	Service Type	Text	"Consumer Postpaid", "Consumer Prepaid", "Lifeline", "Wholesale", "Other"	This field denotes type of service being used by subscribers. Enterprise and M2M subscribers may be grouped into "Other."
Voice Only Subscribers				
E	Voice Only Activations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice activations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a mobile broadband service or a text messaging plan.
F	Voice Only CPGA	Number - Integer		This field identifies the total cost per gross activation for voice activations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a mobile broadband service or a text messaging plan.
G	Voice Only Deactivations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice deactivations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also deactivate a mobile broadband service or a text messaging plan.
H	Voice Only Subs	Number - Integer	24359, 31025, etc. (N/A if not applicable)	This field identifies the number of voice subs who DO NOT subscribe to a mobile broadband service or a text messaging plan at the end of the time period specified in Column A.
I	Voice Only ARPU	Number - 2 decimal points		This field indicates the average revenue per user for voice subs who DO NOT subscribe to a mobile broadband service or a text messaging plan for the time period specified in Column A.
J	Voice Only CCPU	Number - 2 decimal points		This field identifies the cash cost per user (exclusive of CPGA) for voice subs who DO NOT subscribe to a mobile broadband service or a text messaging plan for the time period specified in Column A.
Voice and Text Only Subscribers				
K	Voice and Text Only Activations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice activations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a mobile broadband service (with the exception of text messaging).
L	Voice and Text Only CPGA	Number - Integer		This field identifies the total cost per gross activation for voice activations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a mobile broadband service (with the exception of text messaging).
M	Voice and Text Only Deactivations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice deactivations from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also deactivate a mobile broadband service (with the exception of text messaging).
N	Voice and Text Only Subs	Number - Integer	24359, 31025, etc. (N/A if not applicable)	This field identifies the number of voice subs who DO NOT subscribe to a mobile broadband service (with the exception of text messaging) at the end of the time period specified in Column A.
O	Voice and Text Only ARPU	Number - 2 decimal points		This field indicates the average revenue per user for voice subs who DO NOT subscribe to a mobile broadband service (with the exception of text messaging) for the time period specified in Column A.
P	Voice and Text Only CCPU	Number - 2 decimal points		This field identifies the cash cost per user (exclusive of CPGA) for voice subs who DO NOT subscribe to a mobile broadband service (with the exception of text messaging) for the time period specified in Column A.
Mobile Broadband Only Subscribers				
Q	Mobile Broadband Only Activations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of mobile broadband activations (with the exception of text messaging) from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a voice service.
R	Mobile Broadband Only CPGA	Number - Integer		This field identifies the total cost per gross activation for mobile broadband activations (with the exception of text messaging) from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also activate a voice service.
S	Mobile Broadband Only Deactivations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of mobile broadband deactivations (with the exception of text messaging) from the beginning of the time period specified in Column A to the beginning of the following period, who DO NOT also deactivate a voice service.

"Subs Data" Table

T	Mobile Broadband Only Subs	Number - Integer	24359, 31025, etc. (N/A if not applicable)	This field identifies the number of mobile broadband subs (with the exception of text messaging) who DO NOT subscribe to a voice service at the end of the time period specified in Column A.
U	Mobile Broadband Only ARPU	Number - 2 decimal points		This field indicates the average revenue per user for mobile broadband subs (with the exception of text messaging) who DO NOT subscribe to a voice service for the time period specified in Column A.
V	Mobile Broadband Only CCPU	Number - 2 decimal points		This field identifies the cash cost per user (exclusive of CPGA) for mobile broadband subs (with the exception of text messaging) who DO NOT subscribe to a voice service for the time period specified in Column A.
Voice, Text and Mobile Broadband Subscribers				
W	Voice, Text and Mobile Broadband Activations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice, text and mobile broadband activations from the beginning of the time period specified in Column A to the beginning of the following period.
X	Voice, Text and Mobile Broadband CPGA	Number - Integer		This field identifies the total cost per gross activation for voice, text and mobile broadband activations from the beginning of the time period specified in Column A to the beginning of the following period.
Y	Voice, Text and Mobile Broadband Deactivations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the number of voice, text and mobile broadband deactivations from the beginning of the time period specified in Column A to the beginning of the following period.
Z	Voice, Text and Mobile Broadband Subs	Number - Integer	24359, 31025, etc. (N/A if not applicable)	This field identifies the number of voice, text and mobile broadband subs at the end of the time period specified in Column A.
AA	Voice, Text and Mobile Broadband ARPU	Number - 2 decimal points		This field indicates the average revenue per user for voice, text and mobile broadband subs for the time period specified in Column A.
AB	Voice, Text and Mobile Broadband CCPU	Number - 2 decimal points		This field identifies the cash cost per user (exclusive of CPGA) for voice, text and mobile broadband subs for the time period specified in Column A.
Total Subscribers				
AC	Total Activations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the total number of activations from the beginning of the time period specified in Column A to the beginning of the following period, including subs who activate voice, text and mobile broadband, or any combination of these services.
AD	Total CPGA	Number - Integer		This field identifies the total cost per gross activation for all activations, including those who activate voice, text and mobile broadband, or any combination of these services from the beginning of the time period specified in Column A to the beginning of the following period.
AE	Total Deactivations	Number - Integer	2435, 12102, etc. (N/A if not applicable)	This field identifies the total number of deactivations from the beginning of the time period specified in Column A to the beginning of the following period, including subs who deactivate voice, text and mobile broadband, or any combination of these services.
AF	Total Subs	Number - Integer	24359, 31025, etc. (N/A if not applicable)	This field identifies the total number of subs, including those who subscribe to voice, text and mobile broadband, or any combination of these services at the end of the time period specified in Column A.
AG	Total ARPU	Number - 2 decimal points		This field indicates the average revenue per user across all subs, including those who subscribe to voice, text and mobile broadband, or any combination of these services for the time period specified in Column A.
AH	Total CCPU	Number - 2 decimal points		This field identifies the cash cost per user (exclusive of CPGA) across all subs, including those who subscribe to voice, text and mobile broadband, or any combination of these services for the time period specified in Column A.
AI	Voice Volume MoU	Number - Integer		Total Volume of voice calls in Minutes of Use in a month per subscriber for the time period specified in Column A.
AJ	Text Volume MB	Number - Integer		Total Volume of text equivalent in MB in a month per subscriber for the time period specified in Column A.
AK	Mobile Broadband Data Volume MB	Number - Integer		Total Volume of data exclusive of text usage in MB in a month per subscriber for the time period specified in Column A.

"Plans Data" Table

Please provide plan data requested in the "Plans Data" table for plans that are offered to consumers 1/1 and 7/1 beginning H1 2011 and extending through H2 2013. In general, this table is intended to provide data on available plans nationwide.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_HH	2011_H1 to 2013_H1	The half year for which the data is being collected.
B	Business Unit	Text	"AT&T Wireless", "GoPhone", "Aio Wireless", "MVNO", etc.	This field represents the business unit, subsidiary, or brand which offers the plan.
C	Plan Name	Text		The name or description of the plan as used in the billing system
D	Date First	Text - YYYY_MM	2010_06	The year and month the plan was first offered to new subscribers
E	Date Last	Text - YYYY_MM	2012_03	The year and month the plan was last offered to new subscribers
F	Plan Type	Text	"Consumer Postpaid", "Consumer Prepaid", "Consumer Mobile Broadband-Only", "Consumer Other"	The plan subscriber type. Note: Include small business subscribers but not MVNO, M2M or enterprise customers in any calculations or plan definitions.
G	Voice Share	Text	"Y" or "N"	Whether the minutes of the plan are shared across multiple lines (i.e. family plan).
H	National	Text	"National", "Regional/Local"	An indicator of whether the plan's home calling area is national or local/regional.
I	Minutes Any	Number		The number of anytime minutes included in the plan. If unlimited code as 9999.
J	Data	Number		The number of megabytes included in the plan (if any). If unlimited code as 9999. If none plan code as 0.
K	Data Name	Text		The name or description of the data plan as used in the billing system. If no data, code as N/A.
L	Data Share	Text	"Y" or "N"	Whether data included in the plan can be shared across multiple lines (i.e. mobile share plan). If no data, code as N/A.
M	Smart Data	Text	"Y" or "N"	An indicator for whether the data plan is available to smartphone devices. If no data, code as N/A.
N	Texts	Number		The number of text messages included in the plan (if any). If unlimited code as 9999. If no plan, code as zero.
O	Primary Access Charge	Number		The monthly recurring access charge for the primary line.
P	Additional Access Charge	Number		The monthly recurring access charge per additional line on the account. If not applicable, code as 9999.
Q	Overage Anytime	Number		The per-minute overage rate for anytime minutes in excess of the minutes included in the plan.
R	Text Monthly	Number		The monthly recurring charge for the text messages included in the plan.
S	Overage Text	Number		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.
T	Data Monthly	Number		The monthly recurring charge for the megabytes of data included in the plan.
U	Overage Data	Number		The per-megabyte overage rate for data in excess of the megabytes included in the plan. If no plan provide a la carte rate.
V	Simple Pricing	Text	"Y" or "N"	Listed prices include all taxes and fees.
W	Unlimited Music	Text	"Y" or "N"	Plan provides an option for unlimited music downloads (i.e., Muve)

"Ports Out Data" Table

For each month beginning 01/01/2011 and extending through 09/30/2013, please provide porting data requested in the "Port Out Data" table.

In general, this table is intended to provide data on the ports from AT&T to other providers.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The month for which the data is being collected.
B	CMA	Number - Integer	1 to 734	This field represents the standard market number of the CMA from which subs port.
C	Ports To	Text		The name of the competing service provider to which AT&T subscribers port during the time period specified in Column A.
D	Postpaid Ports Out	Number - Integer		The number of postpaid subscribers who port from AT&T.
E	Prepaid Ports Out	Number - Integer		The number of prepaid subscribers who port from AT&T.

"Ports In Data" Table

For each month beginning 01/01/2011 and extending through 09/30/2013, please provide porting data requested in the "Ports In Data" table. In general, this table is intended to provide data on the ports to AT&T from other providers.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The month for which the data is being collected.
B	CMA	Number - Integer	1 to 734	This field represents the standard market number of the CMA to which subs port.
C	Ports From	Text		The name of the competing service provider whose subscribers port to AT&T during the time period specified in Column A.
D	Postpaid Ports In	Number - Integer		The number of subscribers who port in order to become postpaid subscribers of AT&T.
E	Prepaid Ports In	Number - Integer		The number of subscribers who port in order to become prepaid subscribers of AT&T.

"Revenue Data" Table

For each month beginning 01/01/2011 and extending through 09/30/2013, please provide revenue data requested in the "Revenue Data" table. In general, this table is intended to provide data on the revenue and average revenue per user by CMA and source of revenue.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The year and month for which the data is being collected.
B	CMA	Number - Integer	1 to 734	This field represents the standard market number of the CMA where revenues are earned.
C	Business Unit	Text	"AT&T Wireless", "GoPhone", Aio Wireless", "MVNO", "Total", etc.	This field represents the business unit, subsidiary, or brand which earns the revenue. Applicants should provide data for each business unit separately as well as for the total across all business units. Entries aggregating total data should be labeled "Total."
D	Business Line	Text	"Consumer Prepaid", "Consumer Postpaid", "Total"	This field indicates the particular line of business from which revenue is being earned. Enterprise and M2M revenues may be grouped into "Other."
E	Revenue Class	Text	"Service Revenue" (excluding "High Cost USF", "Lifeline", "Other USF"), "Total"	This field indicates a broad class of revenue encompassing each revenue source. Entries in this field should exclude "High Cost USF", "Lifeline", and "Other USF".
F	Revenue	Number		This field indicates the total revenue from each revenue source.
G	ARPU	Number - 2 decimal points		This field indicates the average revenue per user for each revenue source.
H	Revenue US	Number		This field indicates the total revenue from each revenue source for the whole US (including Puerto Rico).
I	ARPU US	Number - 2 decimal points		This field indicates the average revenue per user for each revenue source for the whole US (including Puerto Rico).

"Site Data" Table

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 or planned for construction by Applicant. The site IDs in this table should correspond to the site IDs entered in the other requested tables. In the event that Applicant does not own the site utilized and information regarding Columns M-R is unavailable, N/A may be written.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2013_06	The latest month for which data is available.
B	Site ID	Text		A unique site ID for the site to which this data record applies.
C	Site Planned	Text	"Y" or "N"	Yes if the site does not currently exist or operational, but planned for construction or operation.
D	Number of Sectors	Number - Integer	1, 2, 3, etc. (N/A for planned site)	This field provides an integer representing the number of sectors this site utilizes.
E	Latitude	Number - At least 6 decimal places	41.756847, 29.633847, etc.	This field is the latitude (NAD 83) of the site in decimal form to at least six significant digits.
F	Longitude	Number - At least 6 decimal places	-87.467568, -95.267568, etc.	This field is the longitude (NAD 83) of the site in decimal form to at least six significant digits.
G	County FIPS	Text	"17031", "51700", etc.	This field is the five-digit FIPS code - based on 2010 designations - of the county in which the site is located.
H	CMA	Number - Integer	1 to 734	This field represents the standard market number of the CMA in which the site is located.
I	Site Type	Text	Possible Entries Below	This field indicates the type of site to which the record applies using one of the possible entries listed below.
			"Macro_Tower" "Macro_Building" "Macro_Other" "Microcell" "Outdoor Pico" "Indoor Pico" "Outdoor Small Cell" "Indoor Small Cell" "Outdoor DAS" "Indoor DAS" "Repeater" "Other"	An outdoor macrocell mounted on a monopole, guyed tower, or free standing tower An outdoor macrocell mounted on a building An outdoor macrocell that does not fit the previous categories (silo, water tower, etc.) An outdoor cell classified by the vendor as a microcell An outdoor cell classified by the vendor as a picocell An indoor cell classified by the vendor as a picocell An outdoor cell classified by the vendor as a 3GPP compliant small cell An indoor cell classified by the vendor as a 3GPP compliant small cell An outdoor Distributed Antenna System An indoor Distributed Antenna System A cell that repeats/boosts the signal of another cell A cell that does not meet any of the above descriptions
J	Site Geographic Classification	Text	"Urban", "Suburban", "Rural"	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.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
K	Current Operator	Text	"Leap Wireless", "AT&T"	The current operator of the site to which this data record applies. In cases where a Leap Wireless site and AT&T site share the same tower or other supporting structure, each site should be entered separately.
L	Company Owned: "Y" or "N"	Text	"Y" or "N"	Is the location of the site owned by the operator?
M	Site Structure Ownership	Text	"AT&T", "Leap Wireless", "Verizon Wireless", "independent entity"	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.
N	Expected to be Decommissioned	Text	"Y" or "N" (N/A for planned site)	This field indicates if the site is currently planned for decommission.
O	Date Decommission Decided	Text - YYYY_MM	2013_06 (or N/A)	This field indicates the date when it was determined that a site was scheduled for decommissioning.
P	Date of Decommission	Text - YYYY_MM	2014_09 (or N/A)	This field indicates the date set for this site to be decommissioned.
Q	Decommission by AT&T Planned	Text	"Y" or "N" (N/A for planned site)	This field indicates whether or not AT&T expects to decommission the site in question in the event the proposed transaction is consummated.
R	Backhaul	Text	Possible Entries Below	This field indicates the type of technology supporting the connection between a cell site type and a backhaul point of presence
			"TDM"	Time division multiple access
			"Fiber"	Lit fiber to tower
			"Microwave"	Point to point or point to multipoint fixed microwave system
			"Other"	Backhaul that does not fall into the above categories

"Deployed Carriers" Table

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 sector. Because sites and sectors can include multiple carriers/channels, the same site/sector ID may appear in multiple rows.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The month for which the data is being collected. Submit data on a quarterly basis from March 2011 to September 2013 as of the second week of the month.
B	Site ID	Text		A unique site ID for the site to which this data record applies.
C	Band	Text	Possible Entries Below	The frequency band in which the channel/carrier in this data record operates.
			"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
D	Technology of Carrier	Text	Possible Entries Below	This field indicates the technology standard used by the channel/carrier described in this record.
			"GSM" "GPRS" "EDGE" "WCDMA" "HSDPA" "HSUPA_HSPA" "HSPA+" "LTE" "Other"	A carrier/channel that only supports GSM (GMSK modulation) A carrier/channel that supports GSM and GPRS A carrier/channel that supports GSM, GPRS and EDGE A wideband CDMA carrier conforming to Release 4 or earlier A wideband CDMA carrier conforming to UTRA Release 5 A wideband CDMA carrier conforming to UTRA Release 6 A wideband CDMA carrier conforming to UTRA Release 7 An LTE carrier conforming to E-UTRA Release 8 or later A carrier that does not conform to one of the technologies listed above
E	Carrier BW_MHz	Number	Possible Entries Below	This field contains the bandwidth in MHz of the carrier described in this record
			0.2 0.2 0.2 5 5 5 5 1.4	Carrier = GSM Carrier = GPRS Carrier = EDGE Carrier = WCDMA Carrier = HSDPA Carrier = HSPA Carrier = HSPA+ Carrier = LTE (Contiguous, Single Band)

Column	Variable Name	Format	Possible Entries/Example Entries	Description
			3 5 10 20 # (Other Number)	Carrier = LTE (Contiguous, Single Band) Carrier = LTE (Contiguous, Single Band) Carrier = LTE (Contiguous, Single Band) Carrier = LTE (Contiguous, Single Band) Carrier = Other
F	Center Freq_MHz	Number	1937.5, 2142.625, etc.	This field contains the unrounded center frequency in MHz of the downlink carrier described in this record.
G	Carrier Active	Text	Possible Entries Below	This field is used to indicate whether a carrier is actively carrying customer traffic.
			"Y" "N"	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

"Traffic" Table

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 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 for the last month of each quarter from Q1 2011 to Q3 2013. 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, "H" indicates traffic carried on a WCDMA/HSPA/HSPA+ (UTRA) network, and "L" indicates traffic carried on an LTE network.

Column	Variable Name	Format	Possible Entries/Example Entries	Description
A	Date	Text - YYYY_MM	2011_01 to 2013_06	The month for which the data is being collected. Submit data on a quarterly basis from March 2011 to September 2013 as of the second week of the month.
B	Site ID	Text		A unique site ID for the site to which this data record applies.
700 MHz Band - GSM/GPRS/EDGE				
C	700_G_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the 700 MHz band
D	700_G_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the 700 MHz band
E	700_G_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the 700 MHz band
700 MHz Band - WCDMA/HSPA/HSPA+				
F	700_H_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by UTRA carriers in the 700 MHz band
G	700_H_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by UTRA carriers in the 700 MHz band
H	700_H_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by UTRA carriers in the 700 MHz band
700 MHz Band - LTE				
I	700_L_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by LTE carriers in the 700 MHz band
J	700_L_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by LTE carriers in the 700 MHz band
Cellular Band - GSM/GPRS/EDGE				
K	Cell_G_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the Cellular band
L	Cell_G_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the Cellular band
M	Cell_G_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the Cellular band
Cellular Band - WCDMA/HSPA/HSPA+				
N	Cell_H_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by UTRA carriers in the Cellular band
O	Cell_H_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by UTRA carriers in the Cellular band
P	Cell_H_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by UTRA carriers in the Cellular band
Cellular Band - LTE				
Q	Cell_L_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by LTE carriers in the Cellular band
R	Cell_L_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by LTE carriers in the Cellular band

Column	Variable Name	Format	Possible Entries/Example Entries	Description
PCS Band - GSM/GPRS/EDGE				
S	PCS_G_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the PCS band
T	PCS_G_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the PCS band
U	PCS_G_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the PCS band
PCS Band - WCDMA/HSPA/HSPA+				
V	PCS_H_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by UTRA carriers in the PCS band
W	PCS_H_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by UTRA carriers in the PCS band
X	PCS_H_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by UTRA carriers in the PCS band
PCS Band - LTE				
Y	PCS_L_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by LTE carriers in the PCS band
Z	PCS_L_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by LTE carriers in the PCS band
AWS Band - GSM/GPRS/EDGE				
AA	AWS_G_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by GSM/EDGE carriers in the AWS band
AB	AWS_G_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by GSM/EDGE carriers in the AWS band
AC	AWS_G_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by GSM/EDGE carriers in the AWS band
AWS Band - WCDMA/HSPA/HSPA+				
AD	AWS_H_Avg BBH Voice Traffic_Erlangs	Number		BBH voice traffic in Erlangs carried by UTRA carriers in the AWS band
AE	AWS_H_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by UTRA carriers in the AWS band
AF	AWS_H_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by UTRA carriers in the AWS band
AWS Band - LTE				
AG	AWS_L_Avg BBH Data Traffic Downlink_MB	Number		BBH base to mobile data traffic in MB carried by LTE carriers in the AWS band
AH	AWS_L_Avg BBH Data Traffic Uplink_MB	Number		BBH mobile to base data traffic in MB carried by LTE carriers in the AWS band

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 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 the company and any other person.
2. The term “Leap” means Leap Wireless International, 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.
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 and Leap, collectively.
6. The term “Application” means the applications submitted by AT&T and Leap on August 1, 2013, with the lead file number for the wireless radio services listed as 0005860676.
7. The term “BTA” means Basic Trading Area.
8. The term “CDMA” means Code Division Multiple Access technology.
9. The term “CMA” means Cellular Market Area.
10. 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.
11. 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.
12. 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.

13. The term “EDGE” means Enhanced Data rates for GSM Evolution technology.
14. The term “EvDO” or “EvDO Rev. A” means Evolution-Data Optimized or Evolution-Data Optimized Revolution A 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 “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).
21. The term “mobile wireless telephone number,” means the 10-digit telephone number assigned to an end-user to access mobile wireless services.
22. 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.

23. The term “mobile wireless services” includes mobile wireless voice services, mobile wireless text services, mobile wireless data services, and mobile wireless applications.
24. 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.
25. 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.
26. The term “MTA” means Major Trading Area.
27. 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.
28. 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.
29. 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, (a) 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, and (b) in the files of any person whose files are to be reviewed and searched to locate documents responsive to this Information Request, even if the plan, analysis and report has not been 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.
30. The term “POPs” means total aggregate population.
31. The term “Proposed Transaction” means the proposed acquisition of Leap by AT&T filed on August 1, 2013, with the lead application file number for the wireless radio services listed as 0005860676.
32. The term “Public Interest Statement” refers to the document filed by the Applicants on August 1, 2013 entitled “Description of Transaction, Public Interest Showing, and Related Demonstrations.”
33. The term “relevant area” means a) each CMA, and b) the United States as a whole (including Puerto Rico), and information must be provided separately for, each CMA.
34. 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, CDMA, EV-DO, EV-DO Rev. A, 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 hotspot 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.
35. The term "relevant service" means (and information must be provided separately for, (a) any of the services identified below and using any of the following formats: GSM, EDGE, CDMA, EV-DO, EV-DO Rev. A, UMTS only, HSPA, HSPA+, and LTE), and (b) post-paid and pre-paid mobile wireless services:
- 1) mobile wireless voice services;
 - 2) mobile wireless text services;
 - 3) mobile wireless data services; and
 - 4) mobile wireless applications.
36. 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.
37. 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.
38. The term "UMTS" means Universal Mobile Telecommunications System technology.
39. "United States" or "U.S." means the United States, its possessions, territories, and outlying areas.

Instructions

1. Unless otherwise specified, all Information and Document Requests cover the period from January 1, 2011 through the date of the Request.
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. The Company should provide a separate response for interrogatory, data, and documents (*i.e.*, please do not submit the Company’s interrogatory and data responses on the same discs).
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. If search terms were used to conduct all or any part of a search conducted in response to this Information Request, provide a list of search terms used, along with a glossary of industry and company terminology. In addition, describe the search methodologies and the applications used to execute the search.
11. 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.
12. 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 privileged, 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.
13. 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.

14. 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, including the image and text file specifications and the load file configuration, and for a sample load file set.
2. Each Summation submission must be on a physical media, either a portable hard drive or DVD-ROM.
3. Each physical media provided must have a label affixed. The label shall state: (a) the name of the party submitting the data, (b) the date of the submission, (c) the volume number of production (see below), and (d) the range of documents contained on the media.
4. Each Summation submission must have a volume number associated with it. On the root of the media, the top-level folder must be named for the volume. This volume number should also be indicated on the physical label of the media. The volume naming scheme should start with a 2 or 3 letter prefix (identifying your company) followed by a 3-digit counter (*e.g.*, ABC001). Load file volumes may not contain more than 25,000 records each (but multiple file volumes may be included on one hard drive).
5. Under the volume folder, the production should be organized in 3 subfolders:
 - a) IMAGES (may contain subfolders, with no more than 5,000 image files per folder) and FULLTEXT (may contain subfolders, with document-level text files). No file may be more than 25 megabytes.
 - b) DOCLINK (documents in native format, including all spreadsheets and presentations)
 - c) LOADFILES (the metadata, EDII, and LST information should be contained in one file, and the custodian append information in a separate file)
6. Each submission shall be accompanied by an spreadsheet (production index), in hard copy and electronic form, detailing what has been produced, by custodian and document identification number, and containing statistical information about each volume.
7. If a password is used, the same password must be used for all submissions. If encryption is used, only Truecrypt software may be used.
8. 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.
9. Subsequent submissions shall not include information produced in previous submissions, unless specifically requested by the Commission. However, if an error occurs in loading, the entire load must be resubmitted, maintaining the original volume number(s). For example, if a hard drive contains volumes ABC005 – ABC 009, and there is an error with volume ABC006, ABC006 must be corrected and the entire submission ABC005 – ABC009 must be resubmitted on a new hard drive.

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 this information is collected 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. For example, and in particular, the deduplication process may not remove attachments to e-mails that are being produced because the attachment is produced elsewhere. Improper deduplication may require the resubmission of a production set.

(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 document identification 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 document identification number range in its entry on the privilege log.

8. Document Identification Numbering

(a) A consistent format for document identification numbering shall be used across the entire production. Document identification 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) Document identification numbers should not contain embedded spaces (“ ”), slashes (“/”), backslashes (“\”), or underscores (“_”). Document identification numbers may contain hyphens (“-”).

(c) Native format files should be assigned a document identification number; if images have been produced with a native format file, the beginning document identification number of the images should be the native format file’s document identification 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 document identification -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)
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
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
EPROPERTIES	Indicate All That	Multi-	X	X	X	X

	Apply : Record Type: Loose File, E-mail, Attachment, Hard Copy, Calendar Appt Privilege Notations: Redacted, Privileged, Family Member of Priv Doc	Entry				
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
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
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
HASHMD5	MD5 hash value (used for deduplication or	Note Text		x	x	x

	other processing)					
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
COMPANIES	Company submitting data	Multi-Entry	x	x	x	x
CUSTODIAN	Custodian(s) / source(s) -- format: Last, First or ABC Dept	Multi-Entry	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
ATTACHMENTS	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
FROM	Author of the e-mail or loose electronic file (as formatted on the	Note Text		x	x	x

	original)					
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-	Note Text		x		

	mail message					
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 DATEAPPTSTART for calendar appointments - YYYYMMDD	Date	x	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
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		