



601 Pennsylvania Ave., NW Suite 800 Washington, DC 20004 | 202-654-5900

CONFIDENTIAL TREATMENT REQUESTED

Pursuant to Sections 0.457 and 0.459 of the FCC's rules and FOIA exemption 4,¹ T-Mobile USA, Inc. ("T-Mobile") respectfully request that the Commission withhold from public inspection and give confidential treatment to the site maps, TV Study files, and deployment scheduled submitted pursuant to Section 27.14 of the Commission's rules.

The FCC and the Freedom of Information Act ("FOIA") recognize the need to protect trade secrets and commercial information. Specifically, FOIA Exemption 4 permits parties to withhold from public inspection "trade secrets and commercial or financial information obtained from a person and privileged or confidential."² Commercial or financial information is confidential under FOIA if its disclosure will cause substantial harm to the competitive position of the entity from which the information was obtained.³ In conformance with this statutory mandate, the Commission allows parties seeking to withhold materials from public inspection under FOIA Exemption 4 to file a request for non-disclosure pursuant to the requirements of Section 0.459.⁴ If a party who submits materials which it wishes withheld from public inspection shows that the materials contain trade secrets or privileged or confidential commercial, financial or technical data, the materials will not be made routinely available for inspection.⁵ Accordingly, pursuant to the Commission's Rules, T-Mobile submits the following explaining the nature of this request for confidential treatment.

The maps, TV Study data, and deployment schedule for which T-Mobile seeks confidential treatment contain commercial and proprietary information regarding specific details of T-Mobile's site planning and wireless network deployment efforts. In particular, the information for which T-Mobile seeks confidential treatment is the location of all transmitter sites in a licensed areas and is a trade secret. This commercially sensitive information customarily would be guarded from competitors and would not be made routinely available for public inspection.⁶

The confidential information contained in the data could result in substantial competitive harm if disclosed. Competitors could use detailed information about T-Mobile's

¹ 47 C.F.R. §§ 0.457, 0.459, 5 U.S.C. § 552(b)(4).

² See 5 U.S.C. § 552(b)(4).

³ See *Nat'l Parks and Conservation Assoc. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879-90 (D.C. Cir. 1992).

⁴ See 47 C.F.R. §§ 0.457(d)(2), 0.459.

⁵ See 47 C.F.R. § 0.457(d)(2).

⁶ See 47 C.F.R. § 0.457(d).



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wireless network and deployment plans to curtail competition.

All information for which protection is sought is treated by T-Mobile as proprietary and confidential. The information is not made available to the public, nor can it be readily obtained or deduced from public sources. To the best of the T-Mobile's knowledge, the information identified as confidential in this request is not available to the public and has not been disclosed to third parties.

Given the current state of the consumer wireless marketplace, T-Mobile believes that three years is a reasonable time period that is sufficient to ensure that release of this information does not cause competitive harm to T-Mobile.

Sincerely,

/s/

Chris Wieczorek, Esq.

Director of Spectrum Policy, Government Affairs

T-Mobile USA, Inc.

Enclosure: ISIX Compliance and Deployment Statement; map, TV Study data



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May 21, 2018

Ms. Barbara Kreisman
Chief, Video Division Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Application of Gray Television Licensee, LLC. for Early Transition from the 600 MHz Spectrum WHSV, Harrisonburg, Virginia Facility ID 4688

Dear Ms. Kreisman,

T-Mobile is pleased to support the efforts of WHSV in transitioning early out of the 600 MHz band. In my capacity as Senior Vice President, Radio Network Engineering and Development, I oversee the buildout and licensing of the 600 MHz wireless spectrum acquired by T-Mobile in Auction 1002 to ensure compliance with our interference protection obligations. T-Mobile has entered into an agreement with Gray Television Licensee, LLC, licensee of WHSV, Harrisonburg, Virginia (Facility ID 4688) (“Station”) to clear certain portions of the 600 MHz spectrum T-Mobile in the central Virginia area in and near Charlottesville.

An early transition of WHSV from Channel 49 to its post-Incentive Auction channel will permit T-Mobile to deploy more than [Confidential Information] new cell sites on its 600 MHz C and D Block licenses.¹ A map of this planned deployment accompanies this submission.

T-Mobile has performed the required Inter-Service Interference (“ISIX”) studies to confirm that these sites will be cleared by the early move of WHSV. WHSV is on channel 49 and is an ISIX Case 4 scenario. The ISIX Case 4 results are depicted in the accompanying map.²

Once WHSV has transitioned from its pre-Auction channel, T-Mobile will commence deployment of equipment using the 600 MHz band. This deployment is expected to start [Confidential Information].

¹ T-Mobile’s deployment also depends upon the early transition of WAHU-CD which T-Mobile is also assisting in transitioning early. The WAHU-CD early move application should be incorporated into consideration of this statement.

² ISIX Case 3 analysis are also included.



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Should you have any further questions, please feel free to contact me.

Sincerely,

/s/

Mark McDiarmid

Senior Vice President, Radio Network Engineering

T-Mobile USA, Inc.

Enclosure: Inter-service Interference analysis documentation

WAHU & WHSV – C & D Block Analysis

Spectrum Engineering

May 2018

WAHU-CD & WHSV-TV – C Block

- Under Title 47 -> Chapter 1 -> Subchapter B -> Part 27-> Subpart N -> §27.1319 section (b):
 - (b) *A licensee authorized to operate wireless services in the 600MHz downlink band:*
 - (1) *Is not permitted to deploy wireless base stations within the noise-limited contour or protected contour of a broadcast television station licensed on a co-channel or adjacent channel in the 600MHz downlink band*
- Analysis for this block takes into consideration the potential interference, as analyzed in TVStudy for stations potentially impacting the wireless carrier downlink, from the following contributors:
 - For the C Block, Downlink ISIX-3:
 - CH39 WBYD-CD
 - CH40 WLFB
 - CH40 WTKR
 - CH40 WNUV
 - CH40 WMVH-CD
 - CH40 WHKY
 - CH40 WAHU-CD
 - CH40 WHIZ-TV
 - CH41 WCHS-TV
 - For the C Block, Uplink ISIX-4:
 - CH47 WMDT + 5km Buffer
 - CH47 WUPV + 5km Buffer
 - CH48 WRC-TV + 5km Buffer
 - CH48 WRAL +5km Buffer, Considered in Analysis as ATSC1
 - CH49 WRAZ +0.5km Buffer
 - CH49 WHSV-TV +0.5km Buffer
 - CH48 WPXI +5km Buffer
 - CH49 WTAP +0.5km Buffer

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WAHU-CD & WHSV-TV – D Block

- Under Title 47 -> Chapter 1 -> Subchapter B -> Part 27-> Subpart N -> §27.1319 section (b):
 - (b) *A licensee authorized to operate wireless services in the 600MHz downlink band:*
 - (1) *Is not permitted to deploy wireless base stations within the noise-limited contour or protected contour of a broadcast television station licensed on a co-channel or adjacent channel in the 600MHz downlink band*
- Analysis for this block takes into consideration the potential interference, as analyzed in TVStudy for stations potentially impacting the wireless carrier downlink, from the following contributors:
 - For the D Block, Downlink ISIX-3:
 - CH40 WAHU
 - CH40 WLFB
 - CH40 WNUV
 - CH40 WTKR
 - CH40 WMVH-CD
 - CH41 WCHS-TV
 - CH42 WPNT
 - CH42 WMPT
 - CH42 WCVE-TV
 - For the D Block, Uplink ISIX-4:
 - CH47 WMDT – Considered in analysis
 - CH47 WUPV + 0.5km Buffer
 - CH48 WRC-TV +5km Buffer
 - CH48 WPXI +5KM Buffer
 - CH48 WRAL – Considered in analysis
 - CH49 WHSV-TV +5km Buffer
 - CH49 WTAP-TV +5km Buffer
 - CH50 WGNT +0.5km Buffer
 - CH50 WOAY – Considered in analysis
 - CH50 WPCB +0.5km Buffer

Confidential Information
