



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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October 15, 2018

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

**Re: Application for Early Transition from the 600 MHz Spectrum,
KTFN, Entravision Holdings, LLC, El Paso, Facility ID 68753
KTDO, NBC Telemundo License, LLC, Las Cruces, Facility ID 36916
KSCE, Channel 38 Christian Television, El Paso, Facility ID 10202**

Dear Ms. Kreisman,

T-Mobile is pleased to support the efforts of KTFN, KTDO, and KSCE 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 these two stations to clear certain portions of the 600 MHz spectrum T-Mobile holds licenses for the El Paso area of Texas and New Mexico.

An early transition of the stations from their current channels to their post-Incentive Auction channels will permit T-Mobile to deploy more than [REDACTED] cell sites on across its 600 MHz B, C, D, and E Block licenses prior to its currently scheduled phase 8 date. 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 these stations.

Once the stations have transitioned from their pre-Auction channel, T-Mobile will commence deployment of equipment using the 600 MHz band. This deployment is expected to start second quarter, 2019.

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



El Paso Accelerated Repack

Spectrum Engineering

El Paso Summary

- 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 takes into consideration the potential interference, as analyzed in TVStudy for:
 - KSCE [39] phase 8
- ISIX 4 Uplink contour analysis:
 - KTFN [51] phase 8
 - KTDO[47] phase 8
- All owned blocks to be clear in this area once these stations repack early
 - PEA 73 and vicinity – B, C, D, and E block ownership
- [REDACTED]

[REDACTED]



T-Mobile