



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

May 9, 2019

Docket No. A-2018-3003259  
Utility Code: 310183

MICHELLE PAINTER  
SPRINT COMMUNICATIONS COMPANY LP  
12502 SUNRISE VALLEY DRIVE  
RESTON VA 20196

RE: Application of Sprint Communications Company L.P. for Approval of a  
General Rule Indirect Change in Control from Softbank Group Corp. to  
T-Mobile US, Inc.

Dear Ms. Painter:

The Commission requires responses to the attached Data Request Set 5 to complete its analysis of materials in the above-referenced docket. **Note that Data Request Set 5 contains confidential and highly confidential information.** Please forward the requested information to the Commission referencing the above docket **within 10 working days of the date of this letter.** Failure to timely respond may result in the rejection of filings or denial of the relief requested at the above-referenced docket.

Please forward responses to Data Request Set 5 to the Secretary of the Commission at the following address:


Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Please reference Docket No. A-2018-3003259 when filing responses. Note that some responses may be e-filed; see the Commission's website at <http://www.puc.pa.gov/efiling/default.aspx> for information on e-filing. A list of document types that may be e-filed can be found on the Commission's website at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Please contact the staff persons listed below regarding clarification of the data requests or if any problem should arise that prevents a full response within ten working days. Please mark responsive materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the application, please send a copy of the information to Marissa Boyle, Bureau of Technical Utility Services, at [maboyle@pa.gov](mailto:maboyle@pa.gov), or (717) 787-7237. Thank you for your cooperation.

Sincerely,

  
Rosemary Chiavetta  
Secretary

Enclosures:

Data Request Instructions

Data Request Set 5 (public)

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**BUREAU OF TECHNICAL UTILITY SERVICES  
DATA REQUEST SET 5 INSTRUCTIONS  
DOCKET NO. A-2018-3003259**

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Pursuant to Chapters 3 and 5 of the Public Utility Code the Bureau of Technical Utility Services hereby propounds Data Request Set 5 to Sprint Communications Company L.P. (Sprint or Company) to be answered in accordance with the following instructions in writing by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the company.

- 1) This data request shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to data requests to conform to available information; including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the data request immediately preceding each response; start each data request and response on a separate page.
- 3) Provide answers in searchable PDF format.
- 4) Provide answers in 12-point font size no smaller than 12-point Times New Roman.
- 5) If maps are provided, provide such maps in color and no smaller than the size of a landscape-oriented standard 8.5" x 11" page.
- 6) Fully answer each question anew. Do not refer to prior responses or submissions. Assume all prior responses have been read.
- 7) Do not repeat prior objections. Assume all prior objections have been read.
- 8) Identify the name, title, and business address of each person(s) providing each response.
- 9) Provide the date on which the response was created.

- 10) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "Sprint" "Company" or "you," as used herein includes Company, its attorneys, agents, employees, contractors, or other representatives.
  
- 11) As used herein the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
  - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
  - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
  - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.
  
- 12) Documents may be submitted under proprietary or confidential seal, but a claim of confidentiality does not excuse the Company from providing timely responses.
  
- 13) Provide information and responses as completed. Do not wait to provide responses until the Company completes all responses.
  
- 14) Pursuant to 52 Pa. Code § 1.36, persons providing responses to these Data Requests must sign and date a copy of the included Verification. Accordingly, provide the following statement to verify responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

- 15) All documents requiring notary stamps must have original signatures. Some responses may be e-filed at <http://www.puc.pa.gov/efiling/default.aspx>. A list of allowable e-filing document types is available at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.
- 16) Please send all responses to the Secretary of the Commission at the following address:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

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**BUREAU OF TECHNICAL UTILITY SERVICES  
DATA REQUEST SET 5  
DOCKET NO. A-2018-3003259**

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**TUS Data Request Set 5-1 through 5-3 refer to Sprint Intrastate Revenue Reporting provided in response to TUS Data Request Set 3-12 through 3-17 as follows:**

**\*\*\*BEGIN CONFIDENTIAL INFORMATION\*\*\***

**\*\*\*END CONFIDENTIAL INFORMATION\*\*\***

1. Provide all intrastate revenues for the years 2006 through 2012 as requested in the November 2018 Set 3 DRs. Provide all revenues whether Sprint believes they are assessable or not. Identify those revenues Sprint believes are not assessable and include an explanation why not.
2. Identify when Sprint eliminated wholesale revenues from its annual Financial Reports, Section 510 Assessments, and PA USF reporting requirements to the PA PUC and, if prior to

2006, provide the same information requested in 1 above for all years for which Sprint did not report wholesale revenues and the two years prior to that.

3. Reconcile the state percentage of national revenues provided by Sprint in DR 16 response, Column G above, and as calculated above in Column F (by dividing Column D by Column B). Complete the information that is missing above for the years 2012 through 2006 or through the year identified in number 2 above as all years for which Sprint failed to report wholesale revenue (plus the 2 prior years).

**TUS Data Request Set 5-4 through 5-5 refer to the Sprint Letter of March 5, 2019 filed at the above-referenced docket.**

4. Identify all intrastate services from which Sprint derives intrastate revenues; identify which Sprint considers jurisdictional to the PA PUC for reporting purposes; for services not considered jurisdictional, explain why not.
5. Is it Sprint's position that only revenues from voice services provided over TDM are jurisdictional to Pennsylvania? If yes, is that Sprint's position for Section 510 Reports, Annual Financial Reports, and PA USF Reports? If no, identify which reports Sprint will continue to file and what revenues will be reported.

**TUS Data Request Set 5-6 through 5-12 discuss Pennsylvania-specific rural broadband deployment benefits and reference Sprint responses to TUS Data Request Set 3-5 through 3-10**

**\*\*\*BEGIN CONFIDENTIAL INFORMATION\*\*\***

**\*\*\*END CONFIDENTIAL INFORMATION\*\*\***

11. Referencing figures 2, 4, and 8 from Sprint Responses to Set 3-5 through 3-10: Provide data, including but not limited to maps with greater detail, recitation of new coverage areas by best estimated municipal boundary(ies), or both, that empirically supports the statement that “[t]he Commission should find that many of these [blue and green] areas are within the projected coverage of the New T-Mobile 5G network.
12. Referencing Sprint Response to Set 3-5 through 3-10: If T-Mobile cannot provide an analysis of state-level capital expenditure and synergy figures, provide the analysis conducted for those market areas that include all or parts of Pennsylvania.

**TUS Data Request Set 5-13 through 5-17 discuss Pennsylvania-specific job creation benefits and reference the Sprint response to TUS Data Request Set 3-11**

**\*\*\*BEGIN HIGHLY CONFIDENTIAL INFORMATION\*\*\***

**\*\*\*END HIGHLY CONFIDENTIAL INFORMATION\*\*\***

14. Referencing Sprint Response to Set 3-11: Identify the existing number of Sprint Wireless and T-Mobile standalone stores currently in existence in Pennsylvania.
15. Referencing Sprint Response to Set 3-11: Identify the number of Sprint Wireless and T-Mobile standalone stores currently in existence in Pennsylvania, their locations, and their combined employee level; indicate those that are anticipated will or may close under New T-Mobile and the number of associated employees and/or authorized dealers who may lose employment.



16. Referencing Sprint Response to Set 3-11: Of the up to five new technologically advanced Customer Experience Centers (CEC) that New T-Mobile anticipates will create approximately 5,600 new jobs in small towns and rural communities, outside of Overland Park, KS, and Rochester, NY, identify any other regions of the country that are considered frontrunners or in any other way more in line than other areas of the country for a new CEC.
17. Referencing Sprint Response to Set 3-11: Comment on, explain, and respond to the claim made in the mid-March 2019 submission before the FCC from 33 Pennsylvania state legislators, the Pennsylvania AFL-CIO, and 11 other organizations that T-Mobile and Sprint and their authorized dealers operate more than 770 retail stores in Pennsylvania and that if the merger is approved, New T-Mobile would shutter more than 168 duplicative stores eliminating 635 retail jobs and dozens of small business authorized dealers in Pennsylvania.

**TUS Data Request Set 5-18 through 5-19 reference Sprint responses to TUS Data Request Set 3-13 and 3-16(c)**

18. Referencing Sprint Response to Set 3 No. 13: Explain how Sprint provides wholesale services over private circuits without providing special access or special access backhaul services in Pennsylvania.
19. Referencing Sprint Response to Set 3 No. 16(c): Is it Sprint's position that the line identified as "Competitive Access Services" (see, e.g., 2006, 2007, 2008, 2009, 2014, 2015, 2016, and 2017 annual reports) and the line identified as "Competitive Access Provider Revenue (see, e.g., 2010, 2011, 2012, and 2013 annual reports) reference different services? If yes, explain fully what distinction in services Sprint understood to exist between "Competitive Access Services" revenues and "Competitive Access Provider" revenues.