

Docket:	<u>A.18-07-011 and</u> <u>A.18-07-012</u>
Exhibit Number:	<u>Cal Advocates-</u>
Commissioner:	<u>C. Rechtschaffen</u>
Admin. Law Judge:	<u>K. J. Bemesderfer</u>
CalAdvocates Project Mgr.:	<u>Shelly Lyser</u>
CalAdvocates Expert Witness:	<u>Eileen Odell</u>



Public Advocates Office

California Public Utilities Commission

Supporting Exhibits to the Public Advocates Office Testimony on Impacts to Low Income Customers

- PUBLIC -

San Francisco, California
January 7, 2019

A.18-07-011 AND A.18-07-012 THE PUBLIC ADVOCATES OFFICE TESTIMONY EXHIBIT INDEX

Exhibit #	Document Name	Public Information	Contains Confidential T-Mobile Information	Contains Confidential Sprint Information
B-1	T-Mobile Response to Public Advocates Office DR 2-8		X	
B-2	T-Mobile Response to Public Advocates Office DR 2-11, CONFIDENTIAL Attachment "TMUS-CPUC-PA-11008100.pdf" at 4, 9.		X	
B-3	Sprint Supplemental Response to Public Advocates Office DR 1-2(g), Confidential Attachment "CA PUC Prepaid Svc Plan Data 201806 – 11.20.2018_CONFIDENTIAL.xls."			X
B-4	T-Mobile Third Supplemental Response to Public Advocates Office DR 1-2, Confidential Attachment "TMUS-CPUC-PA-12004197_(Highly Confidential – Attorneys Eyes Only).xls." <i>Available on CD upon request.</i>		X	
B-5	Sprint Response to Public Advocates Office DR 1-2, Confidential Attachment "Pricing File.xlsx." <i>Available on CD upon request.</i>			X
B-6	T-Mobile Response to Public Advocates Office DR 1-114.	X		
B-7	T-Mobile Response to Public Advocates Office DR 1-116.	X		

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Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-1

T-Mobile Response to Public Advocates Office DR 2-8

Contains CONFIDENTIAL T-Mobile Information

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Joint Application of Sprint) Application No. 18-07-011
Communications Company L.P. (U-5112-C))
and T-Mobile USA, Inc., a Delaware)
Corporation for Approval of Transfer of Control)
of Sprint Communications Company L.P.)
Pursuant to California Public Utilities Code)
Section 854(a))

In the Matter of the Joint Application of Sprint)
Spectrum L.P. (U-3062-C), and Virgin Mobile) Application No. 18-07-012
USA, L.P. (U-4327-C) and T-Mobile USA, Inc.,)
a Delaware Corporation for Review of Wireless)
Transfer Notification per Commission Decision)
95-10-032)

**T-MOBILE USA’S RESPONSE TO THE CALIFORNIA PUBLIC ADVOCATES
OFFICE’S DATA REQUEST 002**

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Attorneys for T-Mobile USA, Inc.

Dated: November 7, 2018

Data Request 2-8.

How will the merger affect the terms, prices, and conditions of Your pre-paid plans?

Response to Data Request 2-8.

T-Mobile objects to this Data Request on the grounds it is vague and ambiguous with respect to temporal scope and the phrases “affect.” T-Mobile further objects to this Data Request on the grounds it seeks information that is dependent on decisions which will not and cannot be finalized until the transaction can be consummated. T-Mobile also objects to this Data Request to the extent that it is duplicative of Cal PA DR1-122.

Subject to and without waiving its objections, T-Mobile responds that it has stated publicly that the merged company will maintain the Boost Mobile, Virgin Mobile USA, and MetroPCS brands as separate brands post-consummation. T-Mobile views the brands as each having their own identity and catering to somewhat different customer segments. All customers of the New T-Mobile’s pre-paid brands will have access to the 5G network and will experience the same enhancements in quality and value as all other customers.

With regard to plans for these brands post-merger, T-Mobile responds as follows:

- **Non-MetroPCS Prepaid:** T-Mobile expects New T-Mobile to maintain the existing Sprint and T-Mobile prepaid brands, including Boost, Virgin Mobile, and T-Mobile-branded prepaid brands, but to reposition these brands across the prepaid segment. Accordingly, it is expected that New T-Mobile will [BHC-AEO] [EHC-AEO] the price of Boost to [BHC-AEO] [EHC-AEO] in the prepaid segment. The Company expects this [BHC-AEO] [EHC-AEO] to [BHC-AEO] [EHC-AEO] New T-Mobile’s total non-MetroPCS prepaid ARPU by [BHC-AEO] [EHC-AEO] while increasing the quality of service for non-MetroPCS prepaid customers.
- **MetroPCS:** The Company assumes that, while the quality of service to MetroPCS customers will increase substantially as a result of New T-Mobile’s supercharged network, MetroPCS’s price will [BHC-AEO] [EHC-AEO] and average revenue per user is projected to [BHC-AEO] [EHC-AEO]. MetroPCS is the first prepaid brand to commit to launch 5G service in 2019. Thus, MetroPCS customers are expected to receive more reliable coverage, faster data speeds, and more total data for [BHC-AEO] [EHC-AEO].

See also Initial and Supplemental Responses to Cal PA DR 1-122.

Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-2

**T-Mobile Response to Public Advocates Office DR 2-11,
CONFIDENTIAL Attachment “TMUS-CPUC-PA-
11008100.pdf” at 4, 9.**

Contains CONFIDENTIAL T-Mobile Information

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Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-3

**Sprint Supplemental Response to Public Advocates Office
DR 1-2(g), Confidential Attachment “CA PUC Prepaid Svc
Plan Data 201806 – 11.20.2018_CONFIDENTIAL.xls.”**

Contains CONFIDENTIAL Sprint Information

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Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-4

T-Mobile Third Supplemental Response to Public Advocates Office DR 1-2, Confidential Attachment “TMUS-CPUC-PA-12004197_(Highly Confidential – Attorneys Eyes Only).xls.”

Available on CD upon Request

Contains CONFIDENTIAL T-Mobile Information

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Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-5

**Sprint Response to Public Advocates Office DR 1-2,
Confidential Attachment “Pricing File.xlsx.”**

Available on CD upon Request

Contains CONFIDENTIAL Sprint Information

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Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-6

T-Mobile Response to Public Advocates Office DR 1-114.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Joint Application of Sprint Communications Company L.P. (U-5112-C) and T-Mobile USA, Inc., a Delaware Corporation for Approval of Transfer of Control of Sprint Communications Company L.P. Pursuant to California Public Utilities Code Section 854(a))))))))	Application No. 18-07-011
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In the Matter of the Joint Application of Sprint Spectrum L.P. (U-3062-C), and Virgin Mobile USA, L.P. (U-4327-C) and T-Mobile USA, Inc., a Delaware Corporation for Review of Wireless Transfer Notification per Commission Decision 95-10-032))))))	Application No. 18-07-012
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**T-MOBILE USA’S RESPONSE TO THE CALIFORNIA PUBLIC ADVOCATES
OFFICE’S DATA REQUEST 001**

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Attorneys for T-Mobile USA, Inc.

Dated: October 10, 2018

Data Request 1-114.

If You do not currently offer LifeLine or Lifeline discounted services in California, but have done so previously, please provide the following information, for each applicable LifeLine/Lifeline service formerly offered:

- a. The dates during which You provided LifeLine or Lifeline in California;*
- b. For each of the years during which You previously provided LifeLine or Lifeline services in California, the total average annual number of wireless Lifeline or Lifeline customers You served;*
- c. The product name(s) of the LifeLine or Lifeline service(s) provided;*
- d. A description of the product or service associated with the LifeLine or Lifeline discount, including information pertaining to whether cellular data was included with Your LifeLine or Lifeline services at a discounted rate;*
- e. A list of Census Blocks in California in which each applicable LifeLine or Lifeline service was formerly offered;*
- f. The price(s) at which each applicable LifeLine or Lifeline service(s) was formerly offered;*
- g. The eligibility requirements of each applicable LifeLine or Lifeline service formerly offered.*

Response to Data Request 1-114.

T-Mobile objects to this Data Request on the grounds it is vague and ambiguous with respect to the phrase “Lifeline discounted services.” T-Mobile further objects to this Data Request on the grounds it seeks information which is publicly available to the Cal PA as providing Lifeline services in California requires a publicly-filed advice letter.

Subject to and without waiving its objections, T-Mobile responds that it does not, and has not ever, provided Lifeline service in California.

Docket: A.18-07-011 and A.18-07-012

Witness: Eileen Odell

Date: January 7, 2019

Public Advocates Office

Exhibit B-7

T-Mobile Response to Public Advocates Office DR 1-116.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Joint Application of Sprint)	Application No. 18-07-011
Communications Company L.P. (U-5112-C))	
and T-Mobile USA, Inc., a Delaware)	
Corporation for Approval of Transfer of Control)	
of Sprint Communications Company L.P.)	
Pursuant to California Public Utilities Code)	
Section 854(a))	

In the Matter of the Joint Application of Sprint)	Application No. 18-07-012
Spectrum L.P. (U-3062-C), and Virgin Mobile)	
USA, L.P. (U-4327-C) and T-Mobile USA, Inc.,)	
a Delaware Corporation for Review of Wireless)	
Transfer Notification per Commission Decision)	
95-10-032)	

**T-MOBILE USA’S RESPONSE TO THE CALIFORNIA PUBLIC ADVOCATES
OFFICE’S DATA REQUEST 001**

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Attorneys for T-Mobile USA, Inc.

Dated: October 10, 2018

Data Request 1-116.

Provide any and all expansion, improvement, and/or promotional plans related to Your provision of LifeLine/Lifeline services for the next three years, assuming the proposed transaction is approved.

Response to Data Request 1-116.

T-Mobile objects to this Data Request on the grounds it is vague and ambiguous with respect to the phrases “expansion,” “improvement,” “promotional plans” and “Your provision.” T-Mobile further objects to this Data Request on the ground it seeks information which cannot be finalized until the transaction is consummated.

Subject to and without waiving its objections, T-Mobile responds that no expansion, modification and/or promotion plans with respect to Lifeline services have been developed for New T-Mobile post-merger. As noted in response to DR 1-115, following consummation of the transaction, New T-Mobile will continue the Lifeline services currently provided by Virgin Mobile.