Docket: A.18-07-011 and

A.18-07-012

Exhibit Number:

Commissioner:

Admin. Law Judge:

Cal Advocates
C. Rechtschaffen

K. J. Bemesderfer

Shelly Lyser

CalAdvocates Expert Witness: Eileen Odell



### PUBLIC ADVOCATES OFFICE



### **Public Advocates Office**

**California Public Utilities Commission** 

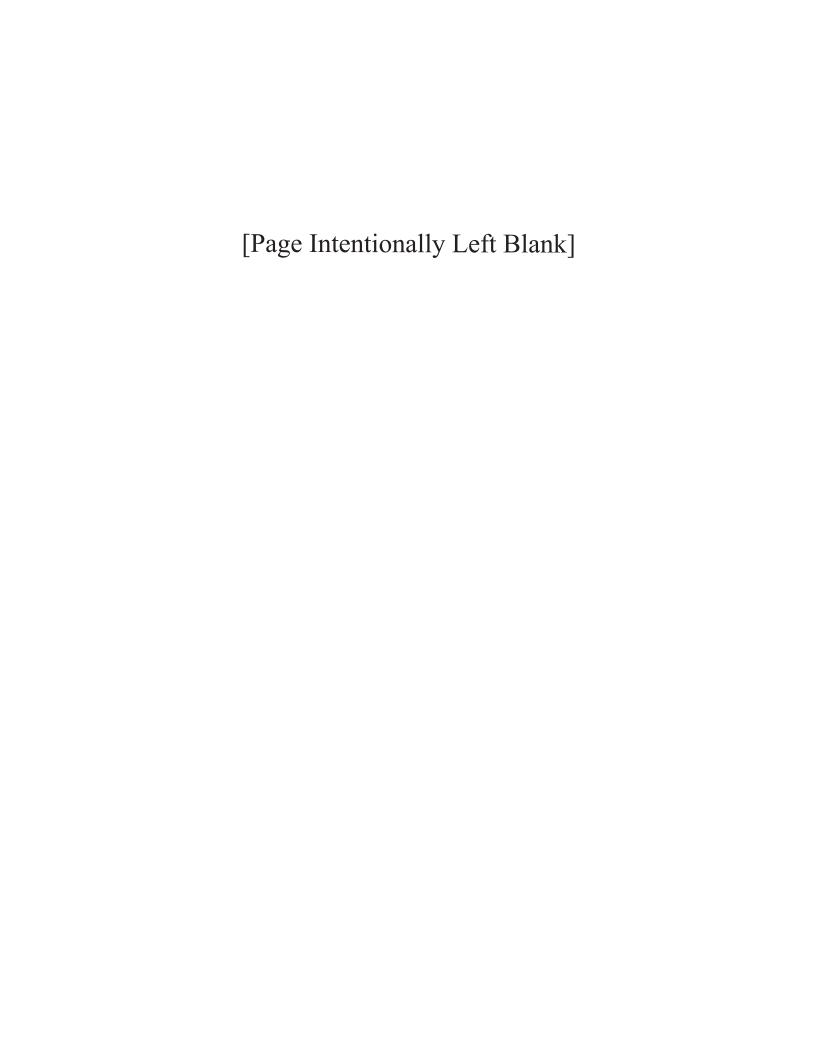
# Supporting Exhibits to the Public Advocates Office Testimony on Impacts to Low Income Customers

- PUBLIC -

San Francisco, California January 7, 2019

### ${\underline{\text{A.18-07-011}}}$ and ${\underline{\text{A.18-07-012}}}$ 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		×	
B-2	T-Mobile Response to Public Advocates Office DR 2-11, CONFIDENTIAL Attachment "TMUS- CPUC-PA-11008100.pdf" at 4, 9.		Х	
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."  Available on CD upon request.		X	
B-5	Sprint Response to Public Advocates Office DR 1-2, Confidential Attachment "Pricing File.xlsx."  Available on CD upon request.			Х
B-6	T-Mobile Response to Public Advocates Office DR 1-114.	Х		
B-7	T-Mobile Response to Public Advocates Office DR 1-116.	Х		



Witness: <u>Eileen Odell</u>

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 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	<ul><li>Application No. 18-07-011</li><li>)</li><li>)</li><li>)</li><li>)</li><li>)</li></ul>
Section 854(a)	-
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 ) ) )

### T-MOBILE USA'S RESPONSE TO THE CALIFORNIA PUBLIC ADVOCATES OFFICE'S DATA REQUEST 002

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Leon M. Bloomfield Law Offices of Leon M. Bloomfield 1901 Harrison St., Suite 1400 Oakland, CA 94612 Telephone: 510.625.1164

Telephone: 510.625.1164 Email: <a href="mailto:lmb@wblaw.net">lmb@wblaw.net</a>

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-N	Mobile to maintain the existing Sprint
	and T-Mobile prepaid brands, including Boost, Virgi	in 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-
	<b>AEO</b> ] New T-Mobile's total nor	n-MetroPCS prepaid ARPU by
	[BHC-AEO] [EHC-AEO] while increasing the	e quality of service for non-
	MetroPCS prepaid customers.	

•	MetroPCS: The Company assumes that, while the quality	y of service to MetroPCS
	customers will increase substantially as a result of New 7	Γ-Mobile's supercharged
	network, MetroPCS's price will [BHC-AEO]	[EHC-AEO] and average
	revenue per user is projected to [BHC-AEO]	<b>EHC-AEO</b> ]. MetroPCS is the
	first prepaid brand to commit to launch 5G service in 20	19. Thus, MetroPCS customers
	are expected to receive more reliable coverage, faster day	a speeds, and more total data for
	[BHC-AEO] [EHC-AEO]	-

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

Witness: <u>Eileen Odell</u>

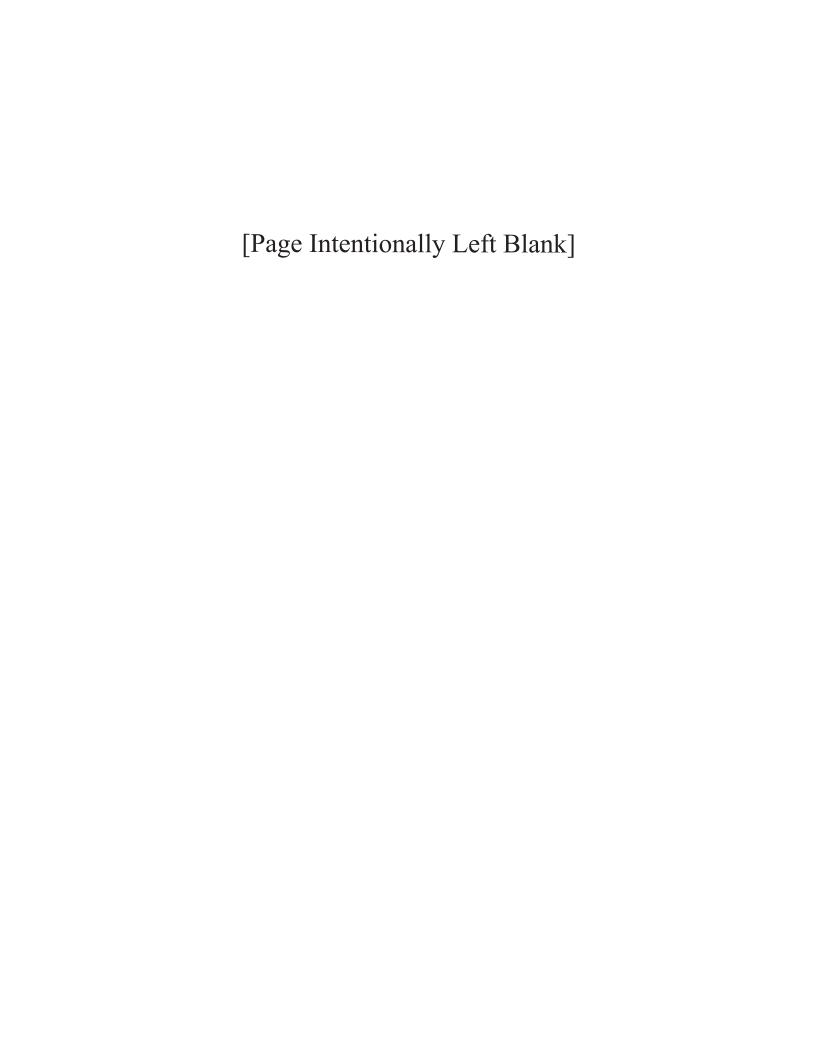
Date: January 7, 2019

### **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** 



Witness: <u>Eileen Odell</u>

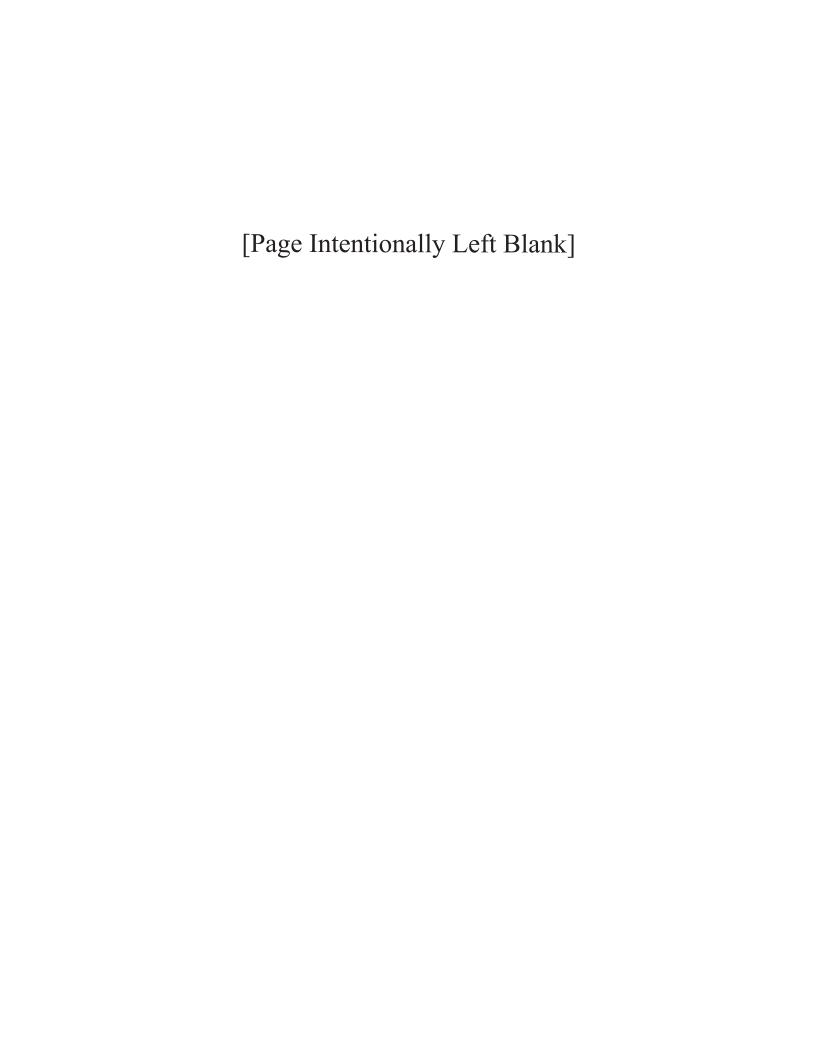
Date: January 7, 2019

### **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** 



Witness: Eileen Odell

Date: January 7, 2019

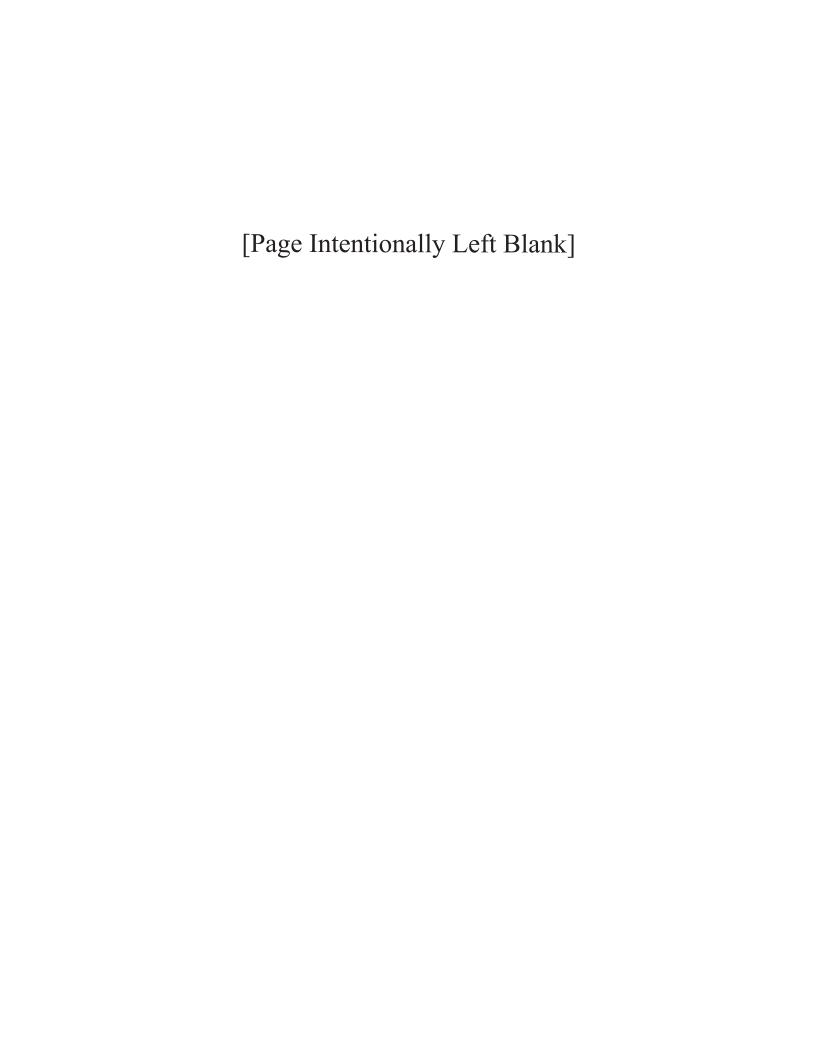
### **Public Advocates Office**

### 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** 



Witness: Eileen Odell

Date: January 7, 2019

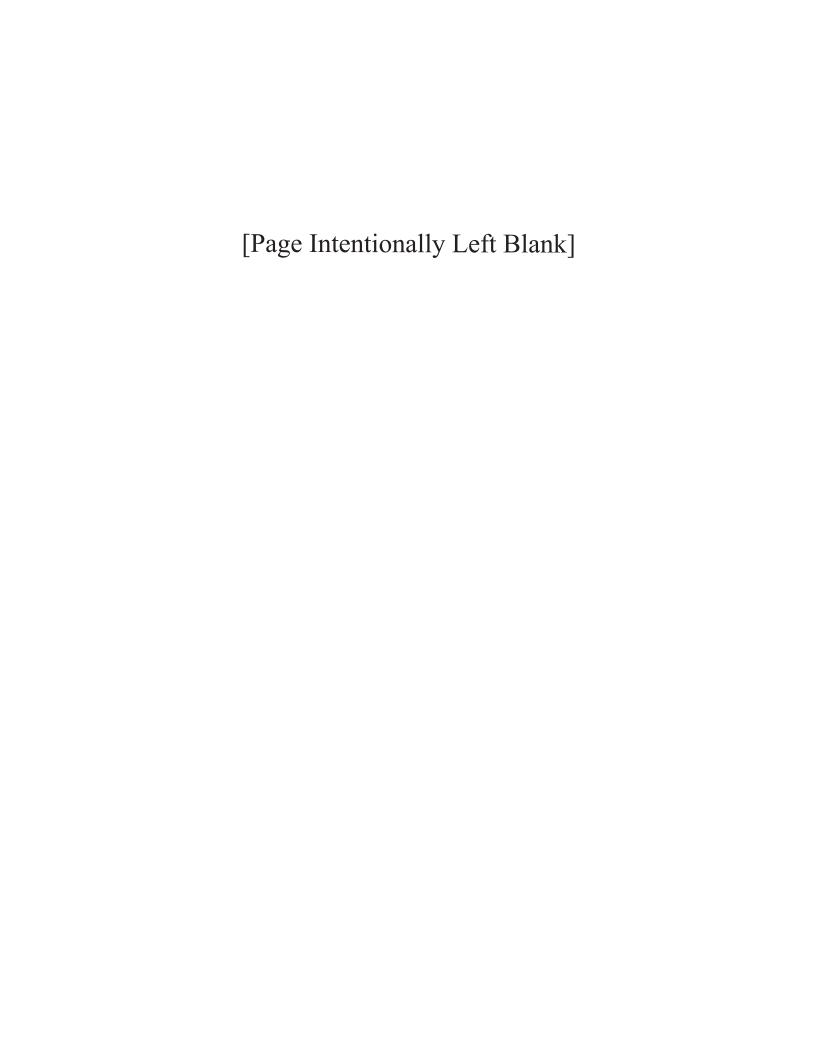
### **Public Advocates Office**

### 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



Witness: <u>Eileen Odell</u>

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 ) ) ) ) )
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 ) ) )

### T-MOBILE USA'S RESPONSE TO THE CALIFORNIA PUBLIC ADVOCATES OFFICE'S DATA REQUEST 001

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Oakland, CA 94612 Telephone: 510.625.1164 Email: lmb@wblaw.net

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.

Witness: <u>Eileen Odell</u>

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 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 ) ) ) ) )
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 ) ) )

### 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.