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Chas. F. McDevitt  
Dean J. (Joe) Miller

July 1, 2011

***Via Hand Delivery***

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, Idaho 83720

**Re: TMW-T-10-01**

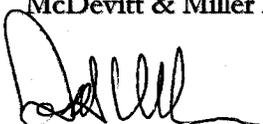
Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven (7) copies of Allied Wireless Communications Corporation's Motion to Defer Deliberations. Also enclosed for filing, please find an original and three (3) copies Allied Wireless Communications Corporation's First Production Requests to T-Mobile West Corporation.

Kindly return a file stamped copy to me.

Very Truly Yours,

McDevitt & Miller LLP



Dean J. Miller

DJM/hh  
Encl.

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*Attorneys for Allied Wireless Communications Corporation*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE  
APPLICATION OF T-MOBILE WEST  
CORPORATION FOR DESIGNATION  
AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
PURSUANT TO 47 U.S.C. §214(e)(2)**

**Case No. TMW-T-10-01  
MOTION TO DEFER  
DELIBERATIONS**

COMES NOW, the Intervenor, Allied Wireless Communications Corporation (“Allied Wireless”), by and through its attorney of record, and pursuant to IPUCRP 56 moves the Commission to defer deliberations on the merits of this matter. Allied Wireless was granted intervenor status by the Commission approximately two weeks ago.<sup>1</sup>

<sup>1</sup> See *In the Matter of the Application of T-Mobile West Corp. for Designation as an Eligible Telecommunications Carrier*, Case No. TMW-T-10-01, Order No. 32265 (June 16, 2011).

This Motion is made and based upon the grounds and for the reasons that Allied Wireless on this date has propounded written discovery requests to the Applicant T-Mobile. A copy of the written discovery requests is attached hereto.

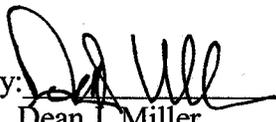
As can be seen by review of the discovery requests, the information sought by the requests is relevant to the proceeding and the information requested is not yet within the Commission record.

Allied Wireless will promptly evaluate the information provided by T-Mobile in response to the discovery requests.

WHEREFORE, Allied Wireless respectfully requests that the Commission defer deliberations on the merits of this matter pending completion of discovery by Allied Wireless.

DATED this   1   day of July, 2011.

**MCDEVITT & MILLER, LLP**

By:   
Dean J. Miller  
*Attorney for Allied Wireless  
Communications*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1 day of July, 2011, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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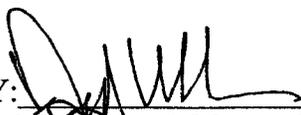
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*Attorneys for Allied Wireless Communications Corporation*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE  
APPLICATION OF T-MOBILE WEST  
CORPORATION FOR DESIGNATION  
AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
PURSUANT TO 47 U.S.C. §214(e)(2)**

**Case No. TMW-T-10-01**

**FIRST PRODUCTION REQUEST OF  
ALLIED WIRELESS  
COMMUNICATIONS  
CORPORATION TO T-MOBILE  
WEST CORPORATION**

Allied Wireless Communications Corporation (“Allied Wireless”), by and through its attorney of record, Dean J. Miller of McDevitt & Miller, LLP, requests that T-Mobile West Corporation (T-Mobile) provide the following documents and information.

This Production Request is to be considered as continuing and T-Mobile (also referred to herein as “you” or “your”) is requested to provide, by way of supplementary

**FIRST PRODUCTION REQUEST OF ALLIED WIRELESS COMMUNICATIONS  
CORPORATION TO T-MOBILE WEST CORPORATION-1**

responses, additional documents that it or any person acting on its behalf may later obtain that will augment the documents produced.

For each item, please indicate the name of the person(s) preparing the answers, along with the job title of such persons) and the witness who can sponsor the answer.

Please provide answers to each question, supporting workpapers that provide detail or are the source of information used in calculations. T-Mobile is reminded that responses pursuant to Commission Rules of Procedure must include the name and phone number of the person preparing the document, and the name, location and phone number of the record holder and if different the witness who can sponsor the answer at hearing, if necessary.

**REQUEST NO. 1:** Please provide copies of all documents filed in this case with the Commission which included a request for confidential designation or treatment.

**REQUEST NO. 2:** Please provide copies of all documents provided or shown to the Commission staff in relation to this case.

**REQUEST NO. 3:** To the extent not included in your responses to Request Nos. 1 or 2, for each of first two years of ETC designation, please provide a detailed formal network improvement plan demonstrating how applicant will use support funds (all federal support types except low-income support); together with all drafts and workpapers leading to such plan. Any information in table format should also be provided in native electronic format, preferably Excel.

**REQUEST NO. 4:** By quarter, for the end of each quarter from the first quarter of 2009 through the second quarter of 2011, please provide T-Mobile's counts of eligible lines/handsets in service in each ILEC wire center included in your application in this case, with disaggregated per-line support, and in each ILEC study area where support is averaged, by residence, single-line business, and multi-line business categories. If any ILEC has disaggregated its support below the wire center level, the counts should also be provided by zone. The response should be provided in native electronic formats, preferably Excel.

**REQUEST NO. 5:** Please provide T-Mobile's forecast of support amount, by type other than low-income, and by ILEC service area, that the applicant expects to receive in the first two years of designation, as well as an explanation of how the forecast was derived; together with all workpapers and calculations showing how the estimates were prepared. The response should be provided in native electronic formats, preferably Excel.

**REQUEST NO. 6:** Please provide detailed information for each T-Mobile project that will use universal service support funds, including:

- A. The description and purpose of the project, its physical location, the ILEC serving that area, and whether the project is a collocation site.
- B. The start date and completion data (by quarter).
- C. The amount of support money allocated to the project, in total and broken down by investment and expense types.

- D. The amount of company's own funds that will be used for each supported project
- E. A brief explanation of why the carrier would not make these improvements without the availability of support funding.
- F. Quantification of resulting service improvements by type (increased coverage, signal strength, capacity, etc.), population benefited, and geographic area benefited (shown on map(s)).

**REQUEST NO. 7:** Please provide electronic copies in native formats maps of T-Mobile's current coverage in Idaho. Without limitation, each map should include separately all layers. If multiple formats are available, please provide in all available formats.

**REQUEST NO. 8:** Please provide electronic copies in native formats of T-Mobile's coverage maps showing the projected coverage upon conclusion of the USF-funded projects identified in your responses. Without limitation, each map should include separately all layers. If multiple formats are available please provide in all available formats.

**REQUEST NO. 9:** Please provide a table of the latitudes and longitudes of each proposed new cell site identified in T-Mobile's Network Improvement Plans. If available, in addition to a paper copy, please provide the table in Excel (or Word) format with the site name and degrees, minutes, and seconds for both latitude and longitude in separate columns.

**REQUEST NO. 10:** Please provide a table of the latitudes and longitudes of each existing cell site of T-Mobile or any cell site currently under construction in Idaho. For cell sites added within the last five years, please include the in-service or acquisition date. For cell sites added since 2009, please include the start of construction date and the in-service date. For cell sites under construction, please provide the start of construction date. If available, in addition to a paper copy, please provide the table in Excel (or Word) format with the site name and degrees, minutes, and seconds for both latitude and longitude in separate columns.

**REQUEST NO. 11:** For all Idaho T-Mobile cell sites completed since July 1, 2010, or currently under construction, or in any stages of planning (including any planning that may be contingent on any occurrence, such as ETC designation), please state by site whether any site acquisition or preliminary engineering work has been planned, authorized, or done for the site. If so, please produce all documents reflecting such work, authorization, or planning.

**REQUEST NO. 12:** Does T-Mobile have any maps or lists of current AT&T, Cingular, or Edge cell sites in Idaho? If so, please provide the most precise information available, such as a table of the latitudes and longitudes or maps in native electronic format. If available, in addition to a paper copy, please provide the table in Excel (or Word) format with the site name and degrees, minutes, and seconds for both latitude and longitude in separate columns.

**REQUEST NO. 13:** Does T-Mobile have any maps detailing the coverage of AT&T, Cingular, or Edge cell sites in Idaho? If so, please provide the most precise coverage information available, such as maps in native electronic formats.

**REQUEST NO. 14:** Please produce copies of any reports, memos, correspondence, or other documents relating to T-Mobile's ETC applications and provided to a T-Mobile Board or board committee, T-Mobile officers, or T-Mobile's parent or affiliate corporations; including, without limiting the foregoing, any discussion of possible relinquishment of support in relation to the proposed merger with AT&T.

**REQUEST NO. 15:** Please provide copies of all T-Mobile capital expenditure budgets for Idaho prepared since 2009.

**REQUEST NO. 16:** Has T-Mobile prepared alternative capital expenditure budgets for Idaho that are contingent on receipt of Federal Universal Service funding? If so please provide them.

**REQUEST NO. 17:** With regard to states where T-Mobile has been designated an ETC:

- a. When was T-Mobile's ETC designation effective?
- b. How many Lifeline subscribers does T-Mobile have?

**REQUEST NO. 18:** Why did T-Mobile relinquish its ETC designations in Tennessee and Virginia?

**REQUEST NO. 19:** Please admit that Philipp Humm, CEO T-Mobile USA, Inc., gave the following testimony before a Subcommittee of the Senate Judiciary Committee in May, 2011: “As data usage continues to explode, spectrum is becoming a constraint to our business, with T-Mobile facing spectrum exhaust over the next couple of years in a number of significant markets. Moreover, our spectrum holdings will not allow us to launch LTE. T-Mobile also lacks the low band spectrum that would enable it to offer nationwide deep in-building coverage, particularly to reach homes in suburbs and in rural areas.”

**REQUEST NO. 20:** With regard to your “Response” filed with the Commission on June 23, 2011, on page 2, that “T-Mobile will remain the designated ETC legal entity” following the merger, please describe in detail the post-merger corporate structure, provide an organization chart, detail all changes in control (direct or indirect) of “T-Mobile” that may or will occur after the merger as a result of changed ownership or corporate structure, and provide copies of relevant documents, including merger agreements.

**REQUEST NO. 21:** With regard to your “Response” filed with the Commission on June 23, 2011, at page 6, that Protesters are motivated by their “financial interests” and “profits,” please state whether or not T-Mobile is motivated by financial interests and

profits and explain your answers. Additionally, please provide all documents relating to financial analyses of the impacts of grant or denial of T-Mobile's ETC application in Idaho.

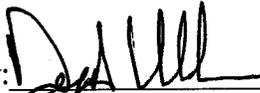
**REQUEST NO. 22:** With regard to your "Response" filed with the Commission on June 23, 2011, beginning at page 9, regarding Idaho's possible loss of relinquished support resulting from the AT&T merger and "T-Mobile's plans," please detail all facts or knowledge you possess regarding AT&T's plans for ETC status and Federal USF support after or in relation to the proposed merger. Please provide all documents that support or relate to your answer.

**REQUEST NO. 23:** With regard to your "Response" filed with the Commission on June 23, 2011, and the discussion of the Texas case beginning on page 11, please provide unredacted copies of all motions and briefs filed by any party in the Texas PUC case.

**REQUEST NO. 24:** With regard to your "Response" filed with the Commission on June 23, 2011, and the discussion of Mr. Stephenson's Congressional testimony beginning at page 14, please explain in detail whether and, if so, how AT&T could or would complete the LTE build out under discussion without concurrently making voice coverage available to same areas as the LTE coverage. Please provide all documents supporting or relating to your answer.

DATED this 1<sup>st</sup> day of July, 2011.

**MCDEVITT & MILLER, LLP**

By:   
\_\_\_\_\_  
Dean J. Miller  
*Attorney for Allied Wireless  
Communications*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1 day of July, 2011, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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