



Federal Communications Commission
Washington, D.C. 20554

January 13, 2021

VIA E-MAIL

Kathleen O'Brien Ham
T-Mobile US, Inc.
601 Pennsylvania Avenue, NW
Suite 800
Washington, DC 20044
kathleen.ham@t-mobile.com

Re: T-Mobile's Proposed Infrastructure and Performance Testing Methodology

Dear Ms. Ham:

T-Mobile's commitments in the T-Mobile/Sprint transaction, which were imposed as conditions to the Commission's approval of the transaction, included a series of 5G network infrastructure and performance benchmarks, to be measured after 3 and 6 years had passed from the close of the merger. To evaluate whether T-Mobile has met these benchmarks, T-Mobile agreed to perform drive tests that "utilize a methodology mutually agreed to by New T-Mobile and the Wireless Telecommunications Bureau," with the goal of capturing "actual user experience under ordinary utilization." On January 8, 2021 after discussions between T-Mobile and the Bureau, T-Mobile submitted to the Bureau a White Paper describing its proposed testing methodology.¹ The Bureau concurs that the White Paper accurately describes the drive test methodologies to which both T-Mobile and the Bureau have agreed.

Specifically, as described in more detail in the White Paper, T-Mobile will conduct mobile and stationary speed tests in more than 5 million unique rural and urban locations. These tests will be conducted using 5G handsets that are available and being marketed to T-Mobile customers at the time of the drive tests. To conduct these speed tests, T-Mobile will drive approximately 1 million road miles, during which it will collect continuous signal strength measurements to help demonstrate the accuracy of its coverage maps.

While T-Mobile employees will perform the actual testing, the testing will be overseen by an independent third-party that must be approved by the Bureau prior to the commencement of the drive testing. This will help ensure that the data submitted to the Bureau are both accurate and complete.

¹ We note that the agreed-upon methodology for conducting on-the-ground testing by T-Mobile in the context of meeting its transaction commitments may not be identical to that adopted for 5G Fund support recipients. 5G Fund support recipients must validate geographically based 5G deployment, whereas T-Mobile's commitments are population-based; and other obligations such as data speed requirements also differ between T-Mobile's commitments and requirements for 5G Fund support recipients. Similarly, this agreed-upon methodology may also not be that which we use to determine whether DISH has met its commitments as set forth in the Order of Modification and Extension of Time to Construct. *Applications of American H Block Wireless L.L.C., DBSD Corporation, Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time*, ULS File Nos. 0008741236, 0008741420, 0008741603, and 0008741789 et al, Order of Modification and Extension of Time to Construct, DA 20-1072 (WTB Sept. 11, 2020). We also note that the methodology described herein may not be that which the Commission adopts in the Digital Opportunity Data Collection proceeding for verification and/or rebutting challenges.

T-Mobile will also submit infrastructure and deployment data, which will help the Bureau to verify whether T-Mobile has met its commitments regarding the deployment of 5G sites and spectrum depth at those sites.

We wish to thank you for your cooperation and responsiveness during our review of your proposed infrastructure and performance testing methodology.

Sincerely,

/s/

Charles Mathias
Co-Director T-Mobile/Sprint Taskforce
Deputy Bureau Chief
Wireless Telecommunications Bureau

/s/

Catherine Matraves
Co-Director T-Mobile/Sprint Taskforce
Deputy Division Chief
Economic Analysis Division
Office of Economic and Analytics

cc: Nancy Victory, Esq.