

November 10, 2009

Writer's Direct Contact
212.336.4252
JKostyu@mofo.com

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Supplement to Cook Inlet GSM IV PCS Holdings, LLC Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act
File No. ISP-PDR-20081001-00020

Dear Ms. Dortch:

T-Mobile USA, Inc. ("T-Mobile") supplements the above-referenced petition for declaratory ruling under Section 310(b)(4) of the Communications Act of 1934, as amended (the "Petition"), to allow up to 100 percent indirect foreign ownership in Cook Inlet GSM IV PCS Holdings, LLC ("Cook IV"), an indirect wholly-owned subsidiary of T-Mobile, which in turn, is a wholly-owned indirect subsidiary of Deutsche Telekom AG ("DT"), a publicly traded German corporation.

T-Mobile previously notified the Commission that it had effectuated an internal corporate reorganization on July 6, 2009 that resulted in the dissolution of an intermediate-tier holding company – T-Mobile International AG ("TMIAG") – between T-Mobile and its parent company DT.¹ T-Mobile recently discovered, however, that the internal corporate reorganization also resulted in the insertion of a new intermediate-tier holding company – T-Mobile Global Zwischenholding GmbH ("TGZ") – in the place of TMIAG. The prior notification did not include TGZ in the description of T-Mobile's then current corporate

¹ See Letter from Jennifer L. Kostyu, counsel to T-Mobile USA, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, ISP-PDR-20081001-00020 (Aug. 4, 2009).

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ownership structure.¹ The attached chart illustrates T-Mobile's correct current ownership structure of T-Mobile after the reorganization.²

The Petition also requests that approval of the foreign ownership interests in certain intermediate-tier holding companies extend to T-Mobile's wholly-owned license subsidiaries listed in Exhibit C to the Petition. By this letter, T-Mobile requests that TGZ be included in the Commission's approval of those intermediate-tier holding companies.

If you have any questions regarding this supplement, please contact the undersigned.

Very truly yours,

/s/ Jennifer L. Kostyu

Jennifer L. Kostyu
Counsel to T-Mobile USA, Inc.

cc: Susan O'Connell (International Bureau)

¹ TGZ, which holds 100 percent of the ownership interests of T-Mobile Global Holding GmbH, is now a wholly-owned direct subsidiary of DT, T-Mobile's ultimate parent company.

² As a part of T-Mobile's internal reorganization, multiple PCS wireless licenses were assigned from SunCom Wireless Puerto Rico License Co., LLC to T-Mobile Puerto Rico LLC ("T-Mobile Puerto Rico") on July 1, 2009 on a *pro forma* basis, of which the Commission was later notified pursuant to its forbearance policies. See ULS File No. 0003918795. Although T-Mobile Puerto Rico had not previously received its own Section 310(b)(4) foreign ownership declaratory ruling, T-Mobile effectuated the *pro forma* assignment because, pursuant to the Commission's Foreign Ownership Guidelines, it need not request a declaratory ruling if T-Mobile Puerto Rico was wholly-owned and controlled by a U.S. company whose foreign ownership had been approved previously by the Commission. At the time it consummated the *pro forma* assignment, T-Mobile was not aware that TGZ, which the Commission had not yet formally reviewed or approved, had been inserted into the T-Mobile-DT corporate ownership structure. T-Mobile notes that the Petition already requests that approval of T-Mobile's foreign ownership interests extend to its wholly-owned license subsidiaries listed in Exhibit C to the Petition, including T-Mobile Puerto Rico.

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**T-Mobile USA, Inc.
Post-Reorganization**

(All ownership interests are 100 percent unless otherwise indicated.)

