

November 5, 2010

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.

Specifically, T-Mobile requests that the Commission condition its grant of the Petition on compliance with the provisions of the National Security Agreement entered into on January 12, 2001, as amended, between DT and the Department of Justice (“DOJ”), the Federal Bureau of Investigation (“FBI”), and the Department of Homeland Security (“DHS”).¹ The requirements of the National Security Agreement are binding upon DT and DT’s wholly-owned subsidiaries, including Cook IV. Section 7.2 of the National Security Agreement provides in relevant part:

¹ See Agreement between DT, VoiceStream, VoiceStream Wireless Holding Corporation, the DOJ and the FBI (Jan. 12, 2001), which is appended to *VoiceStream Wireless Corp., Powertel, Inc., Transferors, and Deutsche Telekom AG, Transferee*, 16 FCC Rcd 9779 (2001) (“DT/VoiceStream Order”). The National Security Agreement was amended in 2008 to add DHS as party. The amendment is appended to *Applications of T-Mobile USA, Inc. and SunCom Wireless Holdings, Inc.*, 23 FCC Rcd 2515 (2008).

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DT agrees that in its applications or petitions to the FCC for licensing or other authority filed with the FCC after the Effective Date, except with respect to pro forma assignments or pro forma transfers of control, it shall request that the FCC condition the grant of such licensing or other authority on DT's compliance with the terms of this Agreement....

The National Security Agreement (Exhibit A) prescribed that the following specific language be included in the conditional grant of interests in FCC licenses in the specific context of the DT/VoiceStream Order:

It is further ordered, that the authorizations and the licenses related thereto are subject to compliance with the provisions of the Agreement between Deutsche Telekom AG, VoiceStream Wireless Corporation, VoiceStream Wireless Holding Corporation on the one hand, and the Department of Justice (the "DOJ") and the Federal Bureau of Investigation (the "FBI") on the other, dated January 12, 2001, which is designed to address national security, law enforcement, and public safety issues of the FBI and the DOJ regarding the authority granted herein. Nothing in the Agreement is intended to limit any obligation imposed by Federal law or regulation including, but not limited to, 47 U.S.C. § 222(a) and (c)(1) and the FCC's implementing regulations.

Accordingly, T-Mobile requests that the Commission impose a similar condition on the grant of the Petition.

Sincerely yours,

/s/ Jennifer L. Kostyu

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