

ATTACHMENT 1

Request for Special Temporary Authority to Assign Assets From T-Mobile USA, Inc. to UVNV, Inc.

Pursuant to Section 63.25 of the Commission's rules,¹ UVNV, Inc. ("Ultra Mobile") request special temporary authority ("STA") to assign certain prepaid wireless customers from T-Mobile USA, Inc. ("T-Mobile USA") to Ultra Mobile. T-Mobile USA and Ultra Mobile have entered into an agreement pursuant to which customers who are currently purchasing prepaid wireless service from T-Mobile USA under the brand name Univision Mobile will be assigned to Ultra Mobile. An application seeking consent for this transaction has been filed with the Commission (the "Application"). As discussed further below, however, it would serve the public interest for the parties to close by February 1, 2016, prior to the Commission's grant of the Application.

Answer to Question 10 (Justification of Need for STA)

The customers that are being assigned from T-Mobile USA to Ultra Mobile consist of prepaid wireless subscribers, who can refill their accounts month-to-month. T-Mobile USA and Ultra Mobile are coordinating to ensure a smooth migration of the subscribers and to avoid disruption of services. The ability to initiate the subscriber migration process on February 1 is essential to the parties' plans for a smooth transition and minimizing customer confusion.

The majority of the affected subscribers purchase the prepaid service in person at local distributor locations using cash. Subscribers rely heavily on these in-person exchanges and calls to customer care to refill their accounts rather than doing so online. Accordingly, the parties have been working with vendors and distributors so that system changes and communications associated with the change in service provider are coordinated to begin February 1. A delay of this date could result in unnecessary confusion by distributors about the availability of and the impact on subscribers' services, as well as potential errors in service activations, refills, and billing that could ultimately result in the loss or disruption of service for customers. This, in turn, would result in customer frustration if they are unable to purchase service or refill accounts. In addition, the transition provides for customer care calls to be routed to Ultra Mobile shortly after closing. A delay in the February 1 migration date could thus potentially affect subscribers' ability to reach appropriate customer care representatives who would have access to the necessary information to assist those subscribers, leading to additional customer confusion, frustration and potential loss or disruption of service.

The parties also are working to make sure affected subscribers are aware of the change in service provider, including by sending text messages to subscribers. More traditional methods of notifying them of service changes, however, such as by U.S. mail and email, are not generally available because complete contact information is usually not provided when purchasing prepaid service in person using cash. The notification process is further complicated because the vast majority of subscribers purchase their services through third party distributors. Delaying the

¹ 47 C.F.R. § 63.25.

migration schedule in this case could result in customer confusion if customers are misinformed about the change in service provider. Grant of this STA request is in the public interest as it would help ensure a smooth transition for customers and avoid unnecessary confusion, frustration or service disruptions.

The parties acknowledge that the grant of this STA request will not prejudice any action the Commission may take on the underlying Application. They further acknowledge that this STA can be revoked by the Commission upon its own motion without a hearing.

Answer to Question 16 (Responses to 47 C.F.R. §§ 63.18(d), (e)(3) and (g))

- (d)** T-Mobile USA holds four international Section 214 authorizations, File Nos. ITC-214-20061004-00452 (global resale service), ITC-214-19960930-00473 (global resale service), ITC-214-20120301-00067 (global resale service), and ITC-214-20011116-00601 (global facilities-based and resale services). T-Mobile USA will retain all of its international Section 214 authorizations. Ultra Mobile holds one international Section 214 authorization, File No. ITC-214-20141103-00290 (global resale service), and will provide service to the transferred customers pursuant to its existing authorization.
- (e)(3)** Because the Application does not seek authority to acquire facilities or to provide services that are not covered by Sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules, subsection (e)(3) is not applicable.
- (g)** Because the Application does not seek facilities-based authority under Section 63.18(e)(3) of the Commission's rules, subsection (g) is not applicable.