

**Request for Extension of Special Temporary Authority**

**DESCRIPTION OF REQUEST**

By the attached FCC Form 601 and pursuant to Section 1.931(a)(3) of the rules,<sup>1/</sup> T-Mobile License, LLC seeks an extension until November 8, 2021 of the special temporary authority (“STA”) issued under call sign WRF839 so that its affiliate T-Mobile USA, Inc. (“T-Mobile”)<sup>2/</sup> may continue to provide service to customers using spectrum in the 600 MHz band that has not been assigned.<sup>3/</sup> Grant of this request is in the public interest because it will allow consumers and businesses to continue to benefit from the additional capacity that the additional spectrum provides. This capacity is needed more than ever due to the Nation’s ever-increasing reliance on mobile wireless networks, a reliance that has been heightened by now-permanent life and work patterns produced by the pandemic.<sup>4/</sup> This relief can be provided by simply permitting otherwise unused spectrum – for which there are no current plans for licensing – to continue to serve the public.

On March 13, 2020, T-Mobile submitted the first requests of their kind to increase its network capacity during the COVID-19 pandemic, explaining that grant of its request would help keep Americans connected. Among others, T-Mobile submitted an emergency request for STA to use 600 MHz band spectrum listed in Exhibit A for which the Commission has not yet authorized

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<sup>1/</sup> See 47 C.F.R. § 1.931(a)(3).

<sup>2/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>3/</sup> The Commission’s rules permit it to grant an extension of STA for up to 180 days. See 47 C.F.R. § 1.931(a)(3). As explained in further detail below, T-Mobile submitted two separate requests for STA to operate on 600 MHz band spectrum that has not been assigned – one was issued under call sign WRF839 and another was issued under call sign WRFS832. Concurrently with this request, T-Mobile is separately seeking an extension of its STA issued under call sign WRFS832. For both extension requests, T-Mobile seeks a 90-day extension based on the expiration of its last STA – *i.e.*, August 8, 2021.

<sup>4/</sup> Because this request seeks renewal of an existing authorization, the associated FCC Form 601 requires the applicant to certify to the status of its performance requirements. Although the applicant has responded to question 57 for purposes of permitting the processing of this request, there are no performance requirements related with the STA for which it has been granted authority.

usage.<sup>5/</sup> The Commission quickly granted T-Mobile's request.<sup>6/</sup> On April 28, 2020, T-Mobile submitted a request for an extension of its STA for a period of 90 days so that it can continue to meet consumer demands during the pandemic.<sup>7/</sup> The Wireless Telecommunications Bureau ("Bureau") granted that extension on June 16, 2020.<sup>8/</sup> T-Mobile has since submitted additional requests for extension,<sup>9/</sup> all of which have been granted by the Bureau.<sup>10/</sup> T-Mobile now files this sixth request for extension, requesting renewal of its STA for a period of 90 days until November 8, 2021.

Granting this additional request for extension of the STA would serve the public interest. *First*, grant of the extension request would directly benefit consumers and businesses by providing additional connectivity capacity. While the Nation is emerging from the pandemic, it is plain that the increased demands imposed on wireless networks due to the pandemic will continue based on what will likely be permanent changes in behaviors. Consumers are expected to continue virtual activities – including remote working, telemedicine, and distance learning – for

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<sup>5/</sup> See Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Donald Stockdale, Chief, Wireless Telecommunications Bureau, FCC (filed Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363051A2.pdf>; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Donald Stockdale, Chief, Wireless Telecommunications Bureau, FCC (filed Apr. 20, 2020), <https://docs.fcc.gov/public/attachments/DOC-363927A1.pdf>.

<sup>6/</sup> The first STA (call sign WRF839) was granted on April 8, 2020 (effective March 15, 2020), and the second STA (call sign WRFS832) was granted on April 24, 2020 (effective April 21, 2020).

<sup>7/</sup> See Application for Renewal of T-Mobile License LLC, ULS File No. 0009059326 (filed Apr. 28, 2020) (as amended on May 7, 2020) (call sign WRF839); Application for Renewal of T-Mobile License LLC, ULS File No. 0009059327 (filed Apr. 28, 2020) (as amended on May 7, 2020) (call sign WRFS832).

<sup>8/</sup> See *Wireless Telecommunications Bureau Market-Based Applications; Action*, Public Notice, Report No. 15065 (June 17, 2020).

<sup>9/</sup> See Application for Renewal of T-Mobile License LLC, ULS File No. 0009159695 (filed July 22, 2020) (as amended on July 31, 2020) (call sign WRF839); Application for Renewal of T-Mobile License LLC, ULS File No. 0009159696 (filed July 22, 2020) (as amended on July 31, 2020) (call sign WRFS832); Application for Renewal of T-Mobile License LLC, ULS File No. 0009286082 (filed Nov. 4, 2020) (call sign WRF839); Application for Renewal of T-Mobile License LLC, ULS File No. 0009286062 (filed Nov. 4, 2020) (call sign WRFS832); Application for Renewal of T-Mobile License LLC, ULS File No. 0009404108 (filed Feb. 2, 2021) (call sign WRF839); Application for Renewal of T-Mobile License LLC, ULS File No. 0009404116 (filed Feb. 2, 2021) (call sign WRFS832); Application for Renewal of T-Mobile License LLC, ULS File No. 0009546105 (filed May 11, 2021) (call sign WRF839); Application for Renewal of T-Mobile License LLC, ULS File No. 0009546132 (filed May 11, 2021) (call sign WRFS832).

<sup>10/</sup> See *Wireless Telecommunications Bureau Market-Based Applications; Action*, Public Notice, Report No. 15276 (Sept. 9, 2020); *Wireless Telecommunications Bureau Market-Based Applications; Action*, Public Notice, Report No. 15520 (Dec. 16, 2020); *Wireless Telecommunications Bureau Market-Based Applications; Action*, Public Notice, Report No. 15783 (Mar. 30, 2021).

the foreseeable future.<sup>11/</sup> Several companies have adopted hybrid work schedules or abandoned offices altogether.<sup>12/</sup> And, as the Commission has recognized, telemedicine remains on the rise.<sup>13/</sup> Many schools also anticipate future closures that will require at least occasional at-home learning.<sup>14/</sup> As FCC Acting Chairwoman recently observed, “[a]s we exit this pandemic, we know that education has been changed. Like so much else in our lives, it has been digitized.”<sup>15/</sup> Indeed, that is why the Commission recently established the Emergency Connectivity Fund to ensure students and school staff remain connected.<sup>16/</sup> All of these shifts in behavior prompted by capabilities discovered and enhanced during the pandemic are likely to be permanent, meaning

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<sup>11/</sup> Securing access to additional capacity is particularly important along the U.S.-Mexico border, areas covered by some of the licenses included in Exhibit A. There, T-Mobile’s ability to meet these needs has been constrained, and continues to be constrained, as a result of interference issues and on-going inter-administration discussions concerning the 700 MHz band. See Letter from Ajit V. Pai, Chairman, FCC, to the Hon. Ted Cruz, United States Senate (dated Aug. 21, 2019), <https://docs.fcc.gov/public/attachments/DOC-359364A1.pdf> (explaining that the unilateral decision by Altán Redes to commence operations on the 700 MHz band in Mexico has created interference issues and the Commission is working with all relevant parties in the U.S. and Mexico to resolve those issues). T-Mobile has been forced to shut down or power down hundreds of sites using that spectrum, making it more difficult to meet consumer needs. Continued access to fallow 600 MHz band spectrum along the U.S.-Mexico border will help T-Mobile meet the increased network needs in the face of the lack of availability of 700 MHz band spectrum.

<sup>12/</sup> See Dinesh Malkani, *Going Hybrid: The Future of Work is Here*, FORBES (June 4, 2021), <https://www.forbes.com/sites/forbestechcouncil/2021/06/04/going-hybrid-the-future-of-work-is-here/?sh=512583d2cb92> (“According to Microsoft’s 2021 report, 73% of employees surveyed expressed a desire for flexible remote work options post-pandemic, and 66% of businesses said they were considering redesigning physical spaces to better accommodate hybrid work environments.”); Emily Courtney, *30 Companies Switching to Long-Term Remote Work*, FLEXJOBS (June 2021), <https://www.flexjobs.com/blog/post/companies-switching-remote-work-long-term/> (noting that “many companies are now figuring out that permanent remote work is the future of work – pandemic or not”).

<sup>13/</sup> See, e.g., *Promoting Telehealth for Low-Income Consumers*, Report and Order, FCC 21-74 (rel. June 21, 2021); see also *id.* at Statement of Acting Chairwoman Jessica Rosenworcel (“We have been changed by this pandemic. . . . Healthcare is a good example. It has been forever altered by this experience, with many of us now accustomed to engaging with nurses and doctors through broadband-enabled video from the comfort of our homes.”); Alex Kulitski, *How Covid-19 Reshaped the Telemedicine Market*, FORBES (June 8, 2021), <https://www.forbes.com/sites/forbestechcouncil/2021/06/08/how-covid-19-reshaped-the-telemedicine-market/?sh=201b63f3a3fe> (“In the U.S. in 2021, projections show at least 20 to 30% of all care will be delivered by means of telemedicine.”).

<sup>14/</sup> See, e.g., Pete Grieve, *Lingering COVID Concerns Prompt Some Ohio Schools to Continue Remote Learning*, SPECTRUM NEWS1 (June 7, 2021), <https://spectrumnews1.com/oh/columbus/news/2021/06/04/ohio-schools-remote-learning-covid19-virtual-option-2021-2022-school-year-digital-academy>; *Missouri School District Moves 2 Summer Schools to Remote Learning After COVID-19 Outbreak*, WBUR (June 29, 2021), <https://www.wbur.org/hereandnow/2021/06/29/missouri-school-covid-outbreak>.

<sup>15/</sup> News Release, *FCC Announces Emergency Connectivity Fund Application Window Will Open on June 29*, FCC (June 15, 2021), <https://docs.fcc.gov/public/attachments/DOC-373265A1.pdf>.

<sup>16/</sup> See *Establishing Emergency Connectivity Fund to Close the Homework Gap*, Report and Order, FCC 21-58 (rel. May 11, 2021).

that requirements that may have previously been met by other media will now be met by mobile wireless networks. Moreover, new COVID variants will likely require regional, if not more widespread, shutdowns. In other words, consumer demand for connectivity through mobile wireless networks has never been higher, and will continue to increase in a post-pandemic world. Indeed, recent spectrum auctions demonstrate carriers' continued needs for network capacity.<sup>17/</sup> Continued authority will help T-Mobile satisfy consumer and business demands.

*Second*, grant of the relief that renewal of the STA will provide can be achieved by simply putting what would otherwise be fallow spectrum to work. In contrast, allowing spectrum to remain unused while network demands remain high is not in the public interest. The 600 MHz spectrum covered by the STA remains in the Commission's inventory, and the Commission has not announced plans to conduct an auction for this spectrum any time soon. Rather than allow this valuable resource to remain dormant, the Commission should allow its continued use by T-Mobile. T-Mobile was the most successful bidder in the Commission's auction of 600 MHz spectrum and has aggressively built out the spectrum for which it is authorized, delivering both Fourth Generation ("4G") LTE and Fifth Generation ("5G") wireless service nationwide.<sup>18/</sup> T-Mobile continues to provide unparalleled service to consumers utilizing the 600 MHz band and other spectrum, including its 5G home internet service and small town initiative, and even recently announced an exciting new venture in 5G driverless cars.<sup>19/</sup> T-Mobile is also on track with its rural expansion plans – its 600 MHz spectrum already covers 295 million individuals with 5G and, by the end of 2023, T-Mobile expects to increase that number to 300 million by, among other things, building 10,000 new cell towers in rural areas.<sup>20/</sup> T-Mobile is therefore uniquely positioned to continue to use this spectrum to help meet America's connectivity demands, particularly as the Nation adapts to a new normal.<sup>21/</sup>

*Finally*, T-Mobile will promptly stop using the spectrum covered by the STA if required by the Commission. T-Mobile expects that the Commission will ultimately initiate a process to make

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<sup>17/</sup> See, e.g., *Auction of Flexible-Use Service Licenses in the 3.7-3.98 GHz Band Closes; Winning Bidders Announced for Auction 107*, Public Notice, 36 FCC Rcd 4318 (2021) (announcing that more than 5,600 flexible-use licenses were won, raising more than \$81 billion in gross bids).

<sup>18/</sup> See, e.g., *Report: T-Mobile 600 MHz Standalone 5G Improves Latency, Coverage (Especially Rural)*, TELECOMPETITOR (Feb. 18, 2021), <https://www.telecompetitor.com/report-t-mobile-600-mhz-standalone-5g-improves-latency-coverage-especially-rural/>; T-Mobile, *Check 5G & 4G LTE Coverage Near You, Coverage Map*, <https://www.t-mobile.com/coverage/coverage-map> (last visited July 27, 2021).

<sup>19/</sup> See Press Release, *T-Mobile's Next Un-carrier Move: #5GforAll*, T-Mobile (Apr. 7, 2021), <https://www.t-mobile.com/news/un-carrier/t-mobiles-next-un-carrier-move-5gforall>; Christine Torralba, *Halo and T-Mobile: Working Together to Launch Driverless Vehicles in Las Vegas Soon*, TMONEWS (July 8, 2021), <https://www.tmonews.com/2021/07/halo-t-mobile-working-together-launch-driverless-vehicles-las-vegas-soon/>.

<sup>20/</sup> See Christine Torralba, *T-Mobile: On Track With Its Rural Expansion Plans*, TMONEWS (June 4, 2021), <https://www.tmonews.com/2021/06/t-mobile-track-rural-expansion-plans/>.

<sup>21/</sup> As Commissioner Carr has suggested, the public interest would be better served by putting spectrum for which the Commission has granted STA during the pandemic to use, potentially even on a permanent basis, rather than allow it to sit fallow. See Howard Buskirk, *Carr: FCC Should Consider Making COVID-19 Spectrum Assignments Permanent*, COMM. DAILY (Apr. 29, 2020).

the 600 MHz band spectrum available for the provision of service on a permanent basis. When that occurs and the spectrum is licensed to another entity, T-Mobile will cease all operations on the unassigned blocks under this authorization. T-Mobile already holds spectrum in these markets and has deployed equipment that relies upon those spectrum holdings. Therefore, no reliance interest will be created by grant of this extension request and no party will be harmed.

If there are any questions regarding this request, the Commission is asked to contact T-Mobile's Steve Sharkey at [Steve.Sharkey@T-Mobile.com](mailto:Steve.Sharkey@T-Mobile.com).

**Exhibit A**

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA002-G	PEA002	Los Angeles, CA	G
WT-PEA018-A	PEA018	San Diego, CA	A
WT-PEA018-B	PEA018	San Diego, CA	B
WT-PEA047-F	PEA047	Brownsville, TX	F
WT-PEA047-G	PEA047	Brownsville, TX	G
WT-PEA053-F	PEA053	Tucson, AZ	F
WT-PEA053-G	PEA053	Tucson, AZ	G
WT-PEA094-A	PEA094	Waco, TX	A
WT-PEA097-F	PEA097	Mankato, MN	F
WT-PEA097-G	PEA097	Mankato, MN	G
WT-PEA102-A	PEA102	Grand Junction, CO	A
WT-PEA106-F	PEA106	Zanesville, OH	F
WT-PEA106-G	PEA106	Zanesville, OH	G
WT-PEA110-E	PEA110	Jackson, TN	E
WT-PEA110-F	PEA110	Jackson, TN	F
WT-PEA110-G	PEA110	Jackson, TN	G
WT-PEA112-G	PEA112	Bowling Green, KY	G
WT-PEA117-E	PEA117	La Grange, GA	E
WT-PEA117-F	PEA117	La Grange, GA	F
WT-PEA117-G	PEA117	La Grange, GA	G
WT-PEA118-E	PEA118	Richmond, IN	E
WT-PEA118-F	PEA118	Richmond, IN	F
WT-PEA118-G	PEA118	Richmond, IN	G
WT-PEA123-A	PEA123	Mansfield, OH	A
WT-PEA125-F	PEA125	Alton, IL	F
WT-PEA125-G	PEA125	Alton, IL	G
WT-PEA126-F	PEA126	Casa Grande, AZ	F
WT-PEA126-G	PEA126	Casa Grande, AZ	G
WT-PEA133-F	PEA133	Nacogdoches, TX	F
WT-PEA133-G	PEA133	Nacogdoches, TX	G
WT-PEA134-F	PEA134	Newark, OH	F
WT-PEA134-G	PEA134	Newark, OH	G
WT-PEA136-E	PEA136	Williamsport, PA	E
WT-PEA136-F	PEA136	Williamsport, PA	F
WT-PEA136-G	PEA136	Williamsport, PA	G
WT-PEA137-G	PEA137	Eau Claire, WI	G

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA139-A	PEA139	Hot Springs, AR	A
WT-PEA140-A	PEA140	Fredericksburg, VA	A
WT-PEA141-F	PEA141	Brainerd, MN	F
WT-PEA141-G	PEA141	Brainerd, MN	G
WT-PEA142-A	PEA142	Merced, CA	A
WT-PEA144-F	PEA144	Paris, TX	F
WT-PEA144-G	PEA144	Paris, TX	G
WT-PEA145-F	PEA145	Columbia, TN	F
WT-PEA145-G	PEA145	Columbia, TN	G
WT-PEA148-F	PEA148	Bellingham, WA	F
WT-PEA148-G	PEA148	Bellingham, WA	G
WT-PEA152-F	PEA152	Tyler, TX	F
WT-PEA152-G	PEA152	Tyler, TX	G
WT-PEA157-A	PEA157	Yuma, AZ	A
WT-PEA160-F	PEA160	Victoria, TX	F
WT-PEA160-G	PEA160	Victoria, TX	G
WT-PEA161-F	PEA161	Carbondale, IL	F
WT-PEA161-G	PEA161	Carbondale, IL	G
WT-PEA162-A	PEA162	Elizabethtown, KY	A
WT-PEA165-E	PEA165	Rome, GA	E
WT-PEA165-F	PEA165	Rome, GA	F
WT-PEA165-G	PEA165	Rome, GA	G
WT-PEA170-G	PEA170	Dothan, AL	G
WT-PEA174-F	PEA174	Springfield, MO	F
WT-PEA174-G	PEA174	Springfield, MO	G
WT-PEA185-G	PEA185	Marquette, MI	G
WT-PEA196-F	PEA196	Cape Girardeau, MO	F
WT-PEA196-G	PEA196	Cape Girardeau, MO	G
WT-PEA199-E	PEA199	Dalton, GA	E
WT-PEA199-F	PEA199	Dalton, GA	F
WT-PEA199-G	PEA199	Dalton, GA	G
WT-PEA201-F	PEA201	Eagle Pass, TX	F
WT-PEA201-G	PEA201	Eagle Pass, TX	G
WT-PEA207-G	PEA207	Brunswick, GA	G
WT-PEA221-F	PEA221	Laredo, TX	F
WT-PEA221-G	PEA221	Laredo, TX	G
WT-PEA239-A	PEA239	Kannapolis, NC	A
WT-PEA249-G	PEA249	Bryan, TX	G

<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA254-G	PEA254	Merrill, WI	G
WT-PEA258-G	PEA258	Cullman, AL	G
WT-PEA270-E	PEA270	Ottawa, IL	E
WT-PEA270-F	PEA270	Ottawa, IL	F
WT-PEA270-G	PEA270	Ottawa, IL	G
WT-PEA272-F	PEA272	Brownwood, TX	F
WT-PEA272-G	PEA272	Brownwood, TX	G
WT-PEA273-E	PEA273	Bloomington, IL	E
WT-PEA273-F	PEA273	Bloomington, IL	F
WT-PEA275-F	PEA275	Corsicana, TX	F
WT-PEA275-G	PEA275	Corsicana, TX	G
WT-PEA284-F	PEA284	Greenwood, SC	F
WT-PEA284-G	PEA284	Greenwood, SC	G
WT-PEA293-F	PEA293	Lawrenceburg, TN	F
WT-PEA293-G	PEA293	Lawrenceburg, TN	G
WT-PEA296-F	PEA296	Pottsville, PA	F
WT-PEA296-G	PEA296	Pottsville, PA	G
WT-PEA310-F	PEA310	Farmington, MO	F
WT-PEA310-G	PEA310	Farmington, MO	G
WT-PEA313-F	PEA313	Lockhart, TX	F
WT-PEA313-G	PEA313	Lockhart, TX	G
WT-PEA314-F	PEA314	Jacksonville, TX	F
WT-PEA314-G	PEA314	Jacksonville, TX	G
WT-PEA321-A	PEA321	Batesville, IN	A
WT-PEA324-E	PEA324	Honesdale, PA	E
WT-PEA324-F	PEA324	Honesdale, PA	F
WT-PEA324-G	PEA324	Honesdale, PA	G
WT-PEA326-G	PEA326	Fergus Falls, MN	G
WT-PEA327-F	PEA327	Orangeburg, SC	F
WT-PEA327-G	PEA327	Orangeburg, SC	G
WT-PEA332-F	PEA332	Bennettsville, SC	F
WT-PEA332-G	PEA332	Bennettsville, SC	G
WT-PEA333-A	PEA333	Sidney, OH	A
WT-PEA334-A	PEA334	Pampa, TX	A
WT-PEA335-A	PEA335	Natchitoches, LA	A
WT-PEA337-F	PEA337	Mineral Wells, TX	F
WT-PEA337-G	PEA337	Mineral Wells, TX	G
WT-PEA339-A	PEA339	Scottsbluff, NE	A



<b>Auction License Offered</b>	<b>Market</b>	<b>Market Name</b>	<b>Block</b>
WT-PEA342-G	PEA342	Mitchell, SD	G
WT-PEA345-F	PEA345	Newberry, SC	F
WT-PEA345-G	PEA345	Newberry, SC	G
WT-PEA347-F	PEA347	New Roads, LA	F
WT-PEA347-G	PEA347	New Roads, LA	G
WT-PEA350-F	PEA350	Forrest City, AR	F
WT-PEA350-G	PEA350	Forrest City, AR	G
WT-PEA351-G	PEA351	Dickinson, ND	G
WT-PEA352-F	PEA352	Gonzales, TX	F
WT-PEA352-G	PEA352	Gonzales, TX	G
WT-PEA353-G	PEA353	Watseka, IL	G
WT-PEA358-F	PEA358	Marble Falls, TX	F
WT-PEA358-G	PEA358	Marble Falls, TX	G
WT-PEA361-A	PEA361	Richfield, UT	A
WT-PEA362-F	PEA362	Payette, ID	F
WT-PEA362-G	PEA362	Payette, ID	G
WT-PEA375-F	PEA375	Deming, NM	F
WT-PEA375-G	PEA375	Deming, NM	G
WT-PEA381-A	PEA381	Del Rio, TX	A
WT-PEA392-A	PEA392	Maryville, MO	A
WT-PEA399-F	PEA399	Lampasas, TX	F
WT-PEA399-G	PEA399	Lampasas, TX	G
WT-PEA407-G	PEA407	Salmon, ID	G
WT-PEA411-A	PEA411	Van Horn, TX	A