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**800 MHz TRANSITION ADMINISTRATOR, LLC  
QUARTERLY PROGRESS REPORT  
FOR THE QUARTER ENDED SEPTEMBER 30, 2020**

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**DECEMBER 11, 2020**



Quarterly Progress Report  
for the Quarter Ended September 30, 2020

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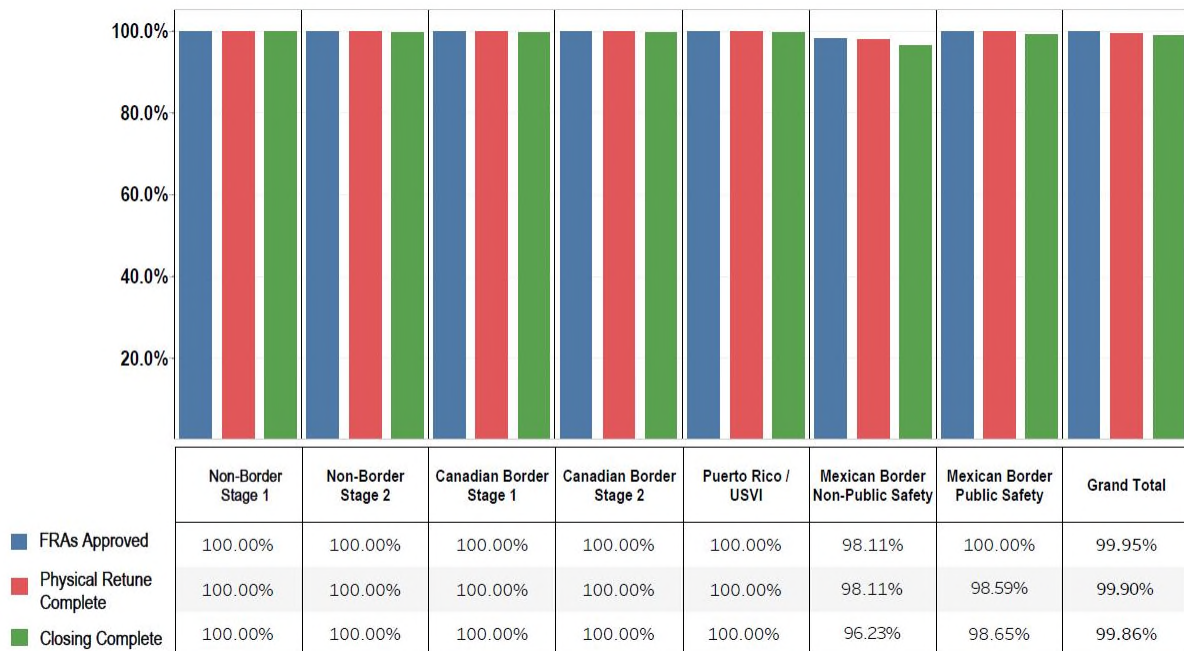
The 800 MHz Transition Administrator, LLC (“TA”) provides its Quarterly Progress Report to the Federal Communications Commission (“FCC”) regarding the progress of the reconfiguration of the 800 MHz band for the quarter ended September 30, 2020. Pursuant to the FCC’s *Report and Order*,<sup>1</sup> the TA, as the manager of the reconfiguration effort, is required to report on a quarterly basis the progress of band reconfiguration.<sup>2</sup>

As of September 30, 2020, only three licensees had not completed reconfiguration activities. Accordingly, the TA has removed sections of this report that require no further update or have not changed in recent quarters. This abbreviated report will highlight ongoing reconfiguration progress as well as program issues and risks.

## RECONFIGURATION PROGRESS OVERVIEW

Chart 1 shows the overall status of Frequency Reconfiguration Agreement (“FRA”) negotiations, implementation, and closing for each stage of the reconfiguration program.

**Chart 1: Status of Negotiations, Physical Retuning, and Closing as of September 30, 2020<sup>3</sup>**



<sup>1</sup> *Improving Public Safety Communications in the 800 MHz Band*, Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order, 19 FCC Rcd 14969 (2004) (“*Report and Order*”).

<sup>2</sup> See 47 C.F.R. § 90.676(b)(3).

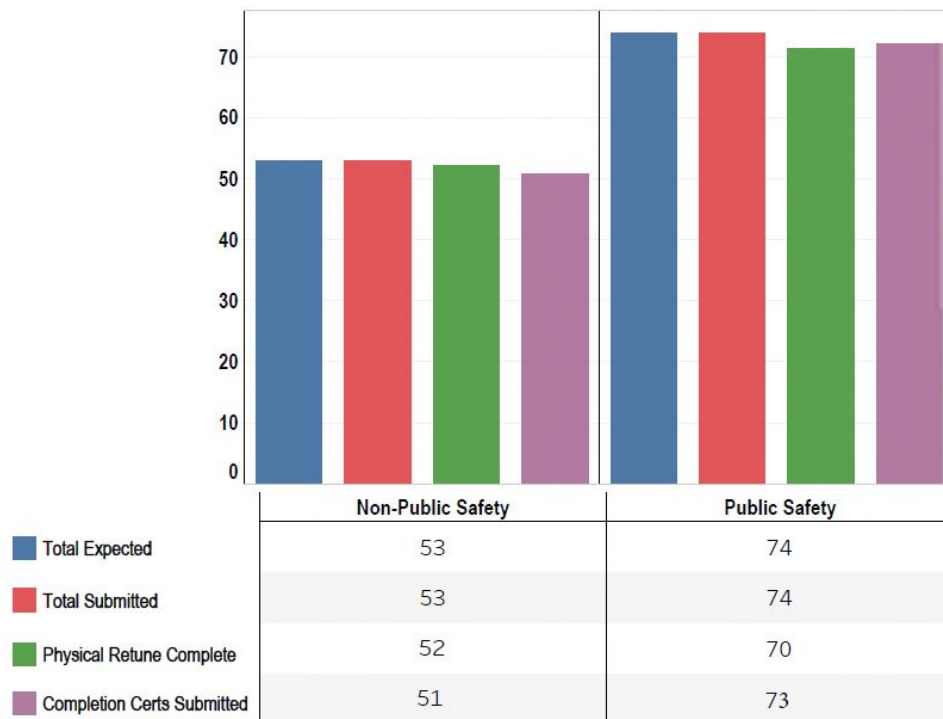
<sup>3</sup> The completion of physical retuning means the licensee retuned its infrastructure to operate on its replacement frequencies and cleared its old frequencies (*i.e.*, it retuned its base stations to its new channels). The licensee is considered to have completed physical retuning even if it has not completed a second (or subsequent) touch of its subscriber units to remove the pre-rebanding channels. Non-border Stage 1 (one FRA), non-border Stage 2 (28 FRAs),

All of the 127 FRAs for Mexican border licensees have been negotiated and submitted to the TA.<sup>4</sup> The TA has approved all of the FRAs with the exception of a single licensee whose FRA is being held by the TA pending resolution of outstanding issues regarding license validity.<sup>5</sup> As of September 30, 2020, the licensees in 98 percent of Mexican border FRAs completed their physical retunes and transitioned to their new channels.

One licensee submitted a Completion Certification in October 2020. As of December 11, 2020, only one Mexican border licensee is performing physical reconfiguration activity.

Chart 2 shows the reconfiguration status of the FRAs for Mexican border non-Public Safety and Public Safety licensees.

**Chart 2: Mexican Border FRAs Reconfiguration Status as of September 30, 2020**



and Mexican Border Public Safety (three FRAs) each include FRAs for agencies that are users on another licensee’s radio system. These agencies have no channels to clear and therefore will not achieve the milestone used by Sprint Corporation (“Sprint”) and the TA to measure the completion of physical retuning. Those FRAs are not included in the calculations for the physical retune complete percentages.

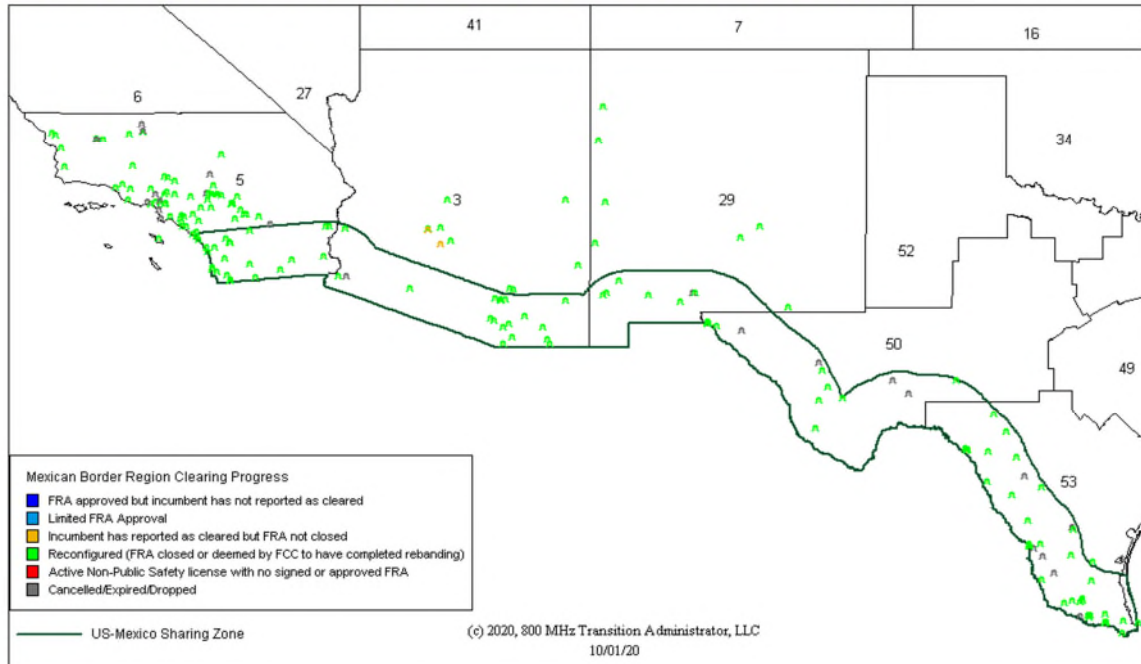
<sup>4</sup> The term “Mexican border licensees” includes U.S. licensees operating in the Sharing Zone (*i.e.*, within 110 kilometers of the U.S.-Mexico border) and in the portions of the NPSPAC regions bordering Mexico that are outside the Sharing Zone.

<sup>5</sup> See *Sprint Corporation and License Acquisitions, LLC*, Order, 29 FCC Rcd 3566-67, para. 4 (2014).

The following maps show the licensed base station locations of licensees and their FRA and implementation status. Map 1 shows Mexican border non-Public Safety licensees, and Map 2 shows Mexican border Public Safety licensees.

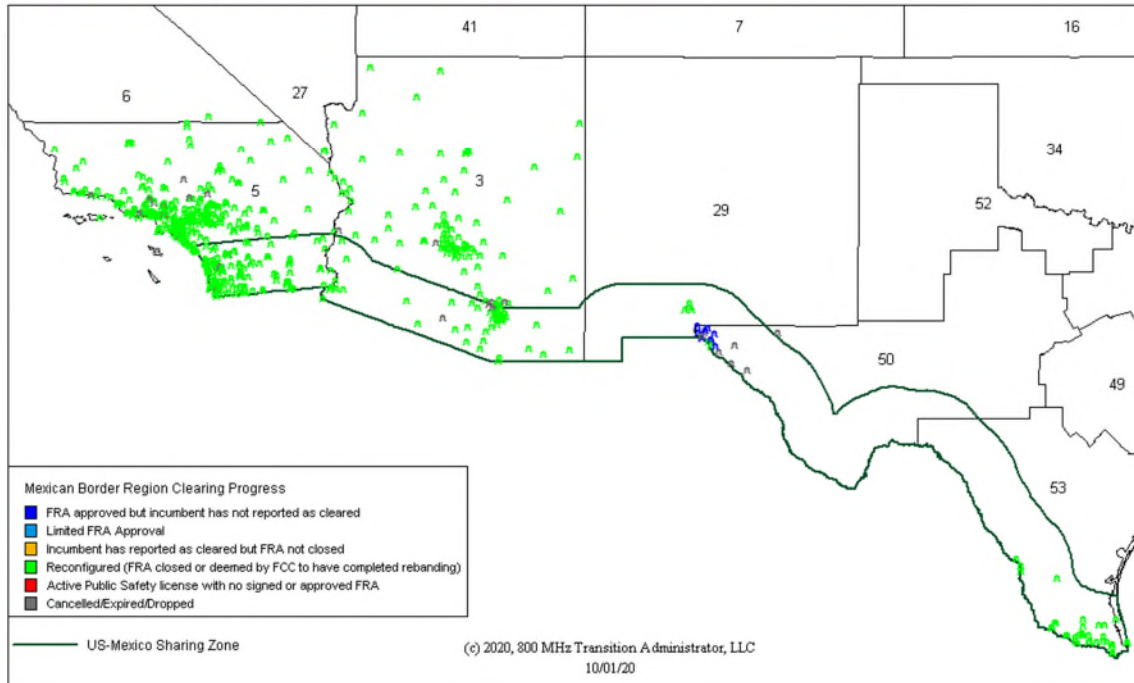
**Map 1: Mexican Border Non-Public Safety Clearing Progress**

**800 MHz Reconfiguration Progress**  
**Mexican Border Region, Non-Public Safety Site-specific Call Signs**  
Clearing Progress and Call Sign location as of 09/30/2020 (Q3 2020)



**Map 2: Mexican Border Public Safety Clearing Progress**

**800 MHz Reconfiguration Progress**  
**Mexican Border Region, Public Safety Site-specific Call Signs**  
Clearing Progress and Call Sign location as of 09/30/2020 (Q3 2020)



**FRA COMPLETION CERTIFICATIONS**

The FRA Completion Certification attests that the licensee has relinquished its original 800 MHz frequencies and reconfigured its facilities to operate on replacement frequencies; that all reconfiguration work required has been satisfactorily completed; and that the licensee and Sprint have agreed on the amount paid by Sprint for such work. During the third quarter of 2020, two FRA Completion Certifications were submitted to the TA. The total number of FRA Completion Certifications submitted and licensees deemed by the PSHSB to have completed rebanding<sup>6</sup> over the course of the program is 2,104 as of September 30, 2020. Of these, the TA reviewed and found 2,104 FRA Completion Certifications sufficient, subject to post-close audit adjustments. Of the 2,106 FRAs executed between licensees and Sprint, approximately 0.1 percent of executed FRAs remain open as of September 30, 2020.

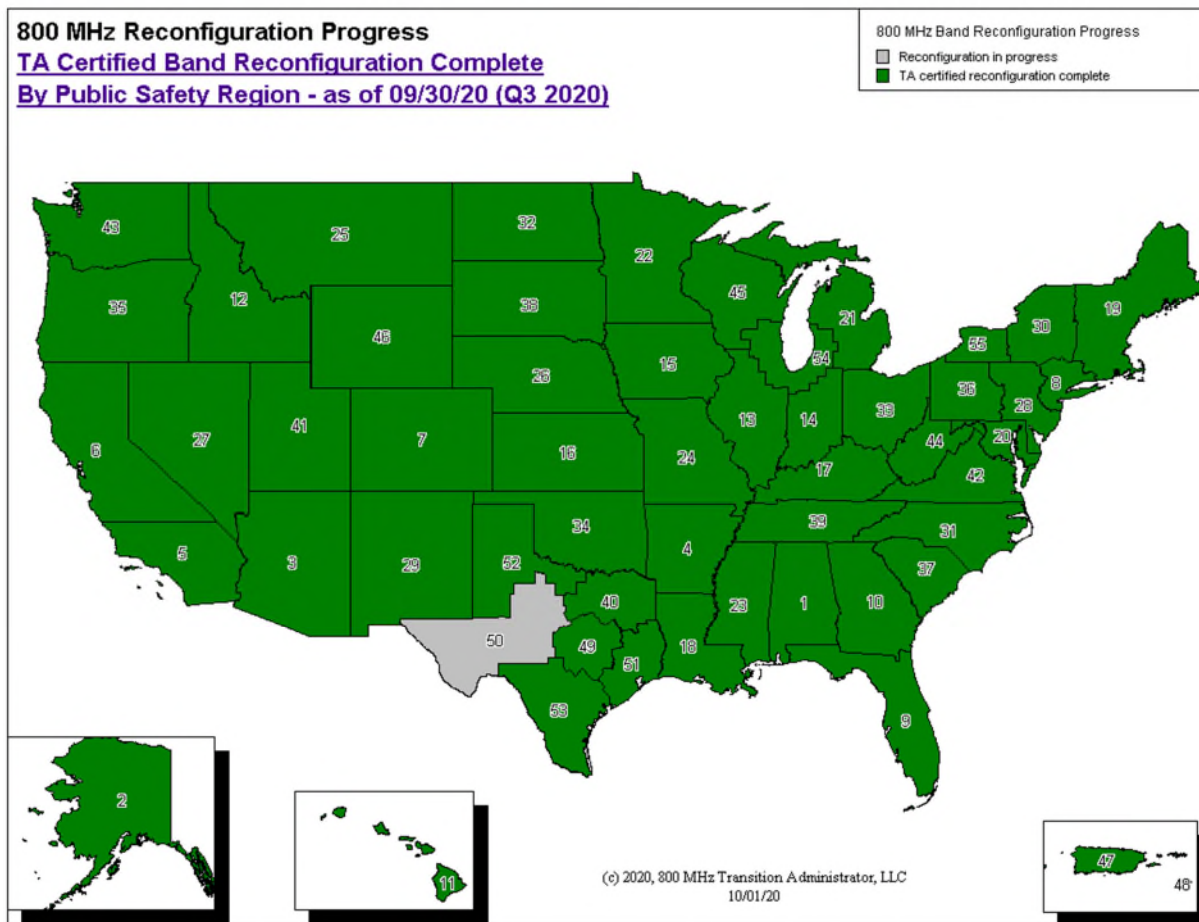
**PROGRESS SINCE LAST REPORT**

On August 5, 2020, the TA certified that band reconfiguration is complete in NPSAC Region 40: Texas – Dallas, NPSAC Region 49: Texas – Austin, NPSAC Region 52: Texas –

<sup>6</sup> See *Improving Public Safety Communications in the 800 MHz Band*, Order, 35 FCC Rcd 2850 (2020).

Lubbock, and NPSPAC Region 53: Texas – San Antonio.<sup>7</sup> Overall, the TA has certified that band reconfiguration is complete in 54 NPSPAC regions and three U.S. territories. The certifications signify that all licensees in these regions that were subject to reconfiguration have relocated to their new channels and modified their FCC licenses to delete their old frequencies or cancelled their licenses. Map 3 shows the regions for which the TA filed certifications.

**Map 3: NPSPAC Regions in which the TA Certified Band Reconfiguration is Complete as of September 30, 2020**



**PROGRAM ISSUES AND RISKS**

The TA is also monitoring issues and risks that could affect the reconfiguration program. Should the sole remaining licensee still performing its physical retune encounter any delays or setbacks, the closing process for the reconfiguration program could be delayed. Delays related to the global COVID-19 pandemic also may slow rebanding activities.

<sup>7</sup> See Letters from Brett S. Haan, TA, to David L. Furth, PSHSB, WT Docket No. 02-55 (filed Aug. 5, 2020).



## PROGRAM EXPENDITURES

As of September 30, 2020, Sprint has reported to the TA that it had incurred approximately \$2,016.7 million in costs on a cash basis for: (1) payments made to incumbent licensees or their vendors in accordance with TA-approved agreements executed by incumbent licensees and Sprint; and (2) replacement equipment costs, including costs related to the development of software for certain incumbent licensee subscriber equipment that enables such subscriber equipment to be retuned rather than replaced and costs related to replacement equipment to be provided to incumbent licensees by Sprint.

## LETTER OF CREDIT

For the quarter ended September 30, 2020, Sprint made its required payments to licensees and vendors. Accordingly, there have been no draws on the Letter of Credit. Sprint reported to the TA that, as of September 30, 2016, it had incurred, on a cash basis, approximately \$312.0 million in Letter of Credit Fees. Sprint has not provided to the TA updated numbers for Letter of Credit Fees incurred since September 30, 2016.

The TA has continued to monitor the amount of the Letter of Credit in view of Sprint's programmatic obligations. As of September 30, 2020, the Letter of Credit balance was \$3.2 million.

## TA FEES AND DISCLOSURES

The TA's fees and expenses for the quarter ended September 30, 2020 were approximately \$1.59 million in fees and \$0.04 million in expenses, for a total of approximately \$1.63 million, which is \$0.20 million less than the forecast for the third quarter of 2020. TA staffing for the quarter ended September 30, 2020 consisted of 9 Full Time Equivalents ("FTEs"). The TA's fees and expenses for the quarter ending December 31, 2020 are estimated at \$1.28 million in fees and \$0.04 million in expenses, for a total of \$1.32 million.

In accordance with the TA's Independence Management Plan, the TA reports that Deloitte Consulting LLP, a subsidiary of Deloitte LLP, received \$11.79 million of non-TA fees and costs from T-Mobile USA, Inc. and its subsidiaries for the quarter ended September 30, 2020; other member firms of Deloitte LLP received \$0.86 million in non-TA fees and costs from T-Mobile USA, Inc. and its subsidiaries for the quarter ended September 30, 2020.<sup>8</sup>

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<sup>8</sup> See 800 MHz Transition Administrator, LLC, "Independence Management Plan for 800 MHz Transition Administrator Team Members Version 1.6," WT Docket No. 02-55, at 5 (filed Sept. 25, 2020). As used in this context, other member firms of Deloitte LLP means Deloitte & Touche LLP, Deloitte Financial Advisory Services LLP, or Deloitte Tax LLP, each a subsidiary of Deloitte LLP. Please see <http://www.deloitte.com/us/about> for a detailed description of the legal structure of Deloitte LLP and its subsidiaries.



**PAST REPORTS AND ONLINE INFORMATION**

This report only contains current updates about the 800 MHz band reconfiguration program. For past reports, completed activities, and a full accounting of prior program progress, refer to the archive of all past Quarterly Progress Reports and additional Appendices on the TA's website at <http://www.800TA.org>.

**APPENDICES**

- |             |   |
|-------------|---|
| APPENDIX 8  | Summary of FRAs with a Completion Certification Submitted, as of September 30, 2020 |
| APPENDIX 9  | Summary of FRAs and PFAs that have not Closed, as of September 30, 2020             |
| APPENDIX 10 | 800 MHz Transition Administrator, LLC Fees and Expenses through September 30, 2020  |

## Appendix 8

### Summary of FRAs with a Completion Certification Submitted, as of September 30, 2020

The data in Appendix 8 only includes FRAs with a Completion Certification submitted during the quarter ended September 30, 2020. A complete list of FRAs and PFAs that closed, were deemed by the PSHSB to have completed rebanding, or for which a Completion Certification was submitted as of June 30, 2020 is available in additional Appendices on the TA's website at <http://www.800TA.org>.

Appendix 8

Summary of Stage 1 FRAs with a Completion Certification Submitted, as of September 30, 2020

Stage 1 FRAs			
	Deal Name	TA Completion Certification Receipt Date	Deal Count
	Wave 1		
	Subtotal FRA count for Wave 1		0
	Wave 2		
	Subtotal FRA count for Wave 2		0
	Wave 3		
	Subtotal FRA count for Wave 3		0
	Wave 4		
	Subtotal FRA count for Wave 4		0
	Canadian Border Region		
	Subtotal FRA count for Canadian Border Region		1
	1   The Boeing Company*	7/28/2020	
	Mexican Border Region		
	Subtotal FRA count for Mexican Border Region		0
	Total FRAs		1

\* The licensee submitted a Completion Certification after the January 15, 2020 deadline. Column C shows the date the TA received the Completion Certification. In an Order released on March 23, 2020, the FCC deemed the licensee to have completed rebanding effective as of June 12, 2020.

Appendix 8

Summary of Stage 2 FRAs with a Completion Certification Submitted, as of September 30, 2020

Stage 2 FRAs			
	Deal Name	TA Completion Certification Receipt Date	Deal Count
	Wave 1		
	Subtotal FRA count for Wave 1		0
	Wave 2		
	Subtotal FRA count for Wave 2		0
	Wave 3		
	Subtotal FRA count for Wave 3		0
	Wave 4		
	Subtotal FRA count for Wave 4		0
	Canadian Border Region		
	Subtotal FRA count for Canadian Border Region		0
	Mexican Border Region		
	1 Hidalgo, County of	7/28/2020	
	Subtotal FRA count for Mexican Border Region		1
	Total FRAs		1

Appendix 9

Summary of Stage 1 FRAs that have not Closed, as of September 30, 2020

<b>Stage 1 FRAs with Physical Reconfiguration Activities Complete that have not Closed</b>		
<b>Deal Name</b>	<b>Aging from Completion of Physical Reconfiguration Activities (In Months)</b>	<b>Deal Count</b>
Wave 1		
Subtotal FRA count for Wave 1		0
Wave 2		
Subtotal FRA count for Wave 2		0
Wave 3		
Subtotal FRA count for Wave 3		0
Wave 4		
Subtotal FRA count for Wave 4		0
Canadian Border Region		
Subtotal FRA count for Canadian Border Region		0
Mexican Border Region		
1 R&M Repeater	64.20	
Subtotal FRA count for Mexican Border Region		1
Total FRAs		1

Appendix 9

Summary of Stage 2 PFAs that have not Closed, as of September 30, 2020

Stage 2 PFAs that have not Closed		
	Deal Name	Deal Count
<b>Wave 1</b>		
1	Colorado CallComm EA Swap	
2	Fairfax County, VA - NCR Regional Coordination	
<b>Subtotal PFA count for Wave 1</b>		<b>2</b>
<b>Wave 2</b>		
<b>Subtotal PFA count for Wave 2</b>		<b>0</b>
<b>Wave 3</b>		
1	JACKSON, CITY OF, MS PH II	
<b>Subtotal PFA count for Wave 3</b>		<b>1</b>
<b>Wave 4</b>		
<b>Subtotal PFA count for Wave 4</b>		<b>0</b>
<b>Canadian Border Region</b>		
<b>Subtotal PFA count for Canadian Border Region</b>		<b>0</b>
<b>Mexican Border Region</b>		
1	CALIFORNIA, STATE OF PH II	
2	IRVINE, CITY OF, CA, CA PH II	
3	Mission, City of	
4	San Bernardino, County Of, CA PH II	
<b>Subtotal PFA count for Mexican Border Region</b>		<b>4</b>
<b>Total PFAs</b>		<b>7</b>

Appendix 10  
800 MHz Transition Administrator, LLC  
Fees and Expenses through September 30, 2020

	Quarter Ending March 31, 2020	Quarter Ending June 30, 2020	Quarter Ending September 30, 2020	Year-to-Date
<b>Fees</b>				
Frequency Management	\$378,509	\$351,674	\$302,639	\$1,032,822
Financial Management	\$570,383	\$449,319	\$357,527	\$1,377,229
General Counsel/Regulatory Management	\$537,732	\$431,299	\$277,792	\$1,246,823
Stakeholder Implementation Management	\$327,024	\$331,269	\$299,324	\$957,617
TA Systems Support	\$146,320	\$132,160	\$148,680	\$427,160
Program Management Support	\$236,532	\$232,766	\$198,358	\$667,655
Alternative Dispute Resolution	\$55,373	\$26,940	\$2,626	\$84,940
<i>Fees Subtotal</i>	\$2,251,871	\$1,955,427	\$1,586,947	\$5,794,245
<b>Expenses</b>	\$33,639	\$58,036	\$45,653	\$137,327
<b>Total Fees and Expenses</b>	<b>\$2,285,509</b>	<b>\$2,013,463</b>	<b>\$1,632,600</b>	<b>\$5,931,572</b>