

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

REDACTED – FOR PUBLIC INSPECTION

August 1, 2011

Re: WT Docket No. 11-18

Dear Ms. Dortch:

QUALCOMM Incorporated (“QUALCOMM”), by its attorneys, hereby submits its third partial response (“Third Partial Response”) to the Federal Communications Commission’s (“FCC”) May 20, 2011, General Information Request Regarding the AT&T/QUALCOMM Transaction in the above-referenced proceeding (“Request”), pursuant to the First and Second Protective Orders (“Protective Orders”) entered in this proceeding.¹ This Third Partial Response supplements QUALCOMM’s responses submitted on June 10 and July 1, 2011 (“First and Second Partial Responses”).

This Third Partial Response reflects communications QUALCOMM had with FCC staff concerning the manner in which QUALCOMM proposed to reply to the Request. These communications concerned QUALCOMM’s understanding of the questions, definitions, and instructions in the Request, the manner in which QUALCOMM keeps the data requested, and the manner in which QUALCOMM searched for and produced this data. These discussions related to and are reflected in the documents provided in this Third Partial Response.

QUALCOMM has taken reasonable efforts to search for, identify, and produce documents and information responsive to the Request and to otherwise respond to the Request consistent with the breadth of the Request and the period of time provided for response. The documents provided in this Third Partial Response are those maintained in the ordinary course of QUALCOMM’s business. The documents provided in this Third Partial Response were collected using the process described in CONFIDENTIAL Exhibit 1 and CONFIDENTIAL Attachments A and B to Exhibit 1.

¹ *Applications of AT&T Mobility Spectrum LLC and Qualcomm Inc. for Consent to the Assignment of Lower 700 MHz Band Licenses*, WT Docket No. 11-18, Protective Order, DA 11-806 (rel. May 20, 2011); *Applications of AT&T Mobility Spectrum LLC and Qualcomm Inc. for Consent to the Assignment of Lower 700 MHz Band Licenses*, WT Docket No. 11-18, Third Protective Order (Revised), DA 11-1098 (rel. Jun. 22, 2011).

REDACTED – FOR PUBLIC INSPECTION

This Third Partial Response includes:

1. Two HIGHLY CONFIDENTIAL DVD-ROMs, which contain HIGHLY CONFIDENTIAL, CONFIDENTIAL, and REDACTED – FOR PUBLIC INSPECTION documents, under seal;
2. One CONFIDENTIAL DVD-ROM, which contains CONFIDENTIAL and REDACTED – FOR PUBLIC INSPECTION documents, under seal;
3. A second CONFIDENTIAL DVD-ROM, which contains a privilege log and a document index in Excel format, which includes ten tabs that group the documents according to the Request(s) to which they are responsive. Within each tab of the document index, the documents are organized by custodian; and
4. Two copies of a REDACTED – FOR PUBLIC INSPECTION DVD-ROM, which contains REDACTED – FOR PUBLIC INSPECTION documents.

Pursuant to the Protective Orders:

1. HIGHLY CONFIDENTIAL information is marked, "*HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WT DOCKET NO. 11-18 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING PROHIBITED*";
2. CONFIDENTIAL information is marked, "*CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WT DOCKET NO. 11-18 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION – ADDITIONAL COPYING PROHIBITED*"; and
3. REDACTED – FOR PUBLIC INSPECTION information is marked, "*REDACTED – FOR PUBLIC INSPECTION*".

Pursuant to the Request, QUALCOMM is providing electronic copies of certain documents in native format. Because QUALCOMM is unable to mark each page of those documents as CONFIDENTIAL or HIGHLY CONFIDENTIAL without altering them, QUALCOMM has included the CONFIDENTIAL and HIGHLY CONFIDENTIAL language described immediately above as part of all native format file names, in addition to their assigned Bates numbers.

Finally, pursuant to the Protective Orders, QUALCOMM is also submitting two copies of the HIGHLY CONFIDENTIAL and CONFIDENTIAL versions of this Third Partial Response to Kathy Harris of the Wireless Telecommunications Bureau by hand delivery.

REDACTED – FOR PUBLIC INSPECTION

Ms. Marlene H. Dortch
August 1, 2011
Page 3 of 3

QUALCOMM requests the return of all HIGHLY CONFIDENTIAL and CONFIDENTIAL information at the conclusion of this proceeding. A password/encryption key for the CONFIDENTIAL and HIGHLY CONFIDENTIAL electronically submitted information has been transmitted by separate email.

Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,



Paul Margie
Counsel to QUALCOMM Incorporated

Enclosures

Exhibit 1

Qualcomm has designated 4 pages of Exhibit 1 as
CONFIDENTIAL Information

Attachment A

**Qualcomm has designated 2 pages of Attachment A as
CONFIDENTIAL Information**

Attachment B

**Qualcomm has designated 21 pages of Attachment B as
CONFIDENTIAL Information**

Qualcomm has designated 5,478 pages of 801 responsive documents as **HIGHLY CONFIDENTIAL INFORMATION**.

Qualcomm has designated 610 pages of 26 responsive documents as **CONFIDENTIAL INFORMATION**.

REDACTED – FOR PUBLIC INSPECTION

Qualcomm has designated 88 pages of a Production Index
as **CONFIDENTIAL** Information

REDACTED – FOR PUBLIC INSPECTION

Qualcomm has designated 154 pages of a Privilege Log
as **CONFIDENTIAL** Information