



2. Sprint Spectrum will address each of the listed issues, and will also provide commentary concerning the overarching issues facing it as part of its incorporation into the operations of other wireless carriers, giving rise to the inevitable growing pains encountered in the merger of operations with different histories and systems. The key point is that Sprint Spectrum has at no time ignored the Commission's orders, and that it has in fact made significant progress in attaining compliance with the Commission's June 17 Order.

#### A. Changes to the Billing System

3. The changes to the billing system are designed to calculate and charge the KUSF assessments to each customer correctly. Those changes were largely completed by October 1, allowing for customer invoices for September to be calculated and determining that additional KUSF refunds were necessary through that billing cycle.

4. The software changes that allow for inclusion of the KUSF refunds on customer invoices were implemented on December 2, so, as noted below, the refunds will be reflected on customer invoices issued throughout December. With the changes in the billing system, the refunds reflected in customer invoices are scheduled to be completed by the end of December, 2021.

#### B. Customer Refunds

5. The process for determining the amount of individual refunds was completed in early December. The customer refunds to be included in customer invoices will be made during the course of December, but since there are several billing cycles throughout the

month, all such refunds will not be completed until the end of December. Customers will see the refunds as a line item on their monthly statements.

6. A relatively significant number of individual refunds, in the range of 200 customer accounts, have small refunds (about half of those customers having refunds of less than \$1). Sprint Spectrum would have to issue separate checks for those refunds, and will seek guidance from the Commission as to whether those refunds should be generated. It is the company's experience that customers rarely cash or deposit checks of such small amounts, and in fact such checks generate many inquiries as to whether they are fake or scams.

7. For former customers for whom refunds have been calculated, the company intends to pay those refunds by individual checks mailed to the customers. The amounts of those refunds have been determined and all of the checks will be mailed by January 15, 2022, subject to Commission guidance concerning checks in the amount of less than \$1.

#### C. Filing True-Up Reports and Corporate Affidavit

8. The company is in the process of preparing the true-up reports. Given the merger of T-Mobile and Sprint, and the consequent requirements to coordinate the billing systems of the two companies and their affiliates and subsidiaries, the process has taken longer than originally thought. However, the process is ongoing and should be completed by January 31, 2022, at which time the true-up reports will be submitted.

9. When the true-ups have been prepared and submitted, the company will be in a position to prepare and file the affidavit, signed by a corporate officer, reflecting that all

of the mandated compliance activities have been completed. From the language in the June 17 Order, the company concluded that the Commission desired to have a single affidavit attesting to completion of the ordered tasks. As the billing systems changes have been completed, the refunds will be reflected on customer invoices in December, and the true-up reports will be completed and filing shortly, the company anticipates that the corporate affidavit will be filed with the Commission by February 10, 2022.

### **CONCLUSION**

10. Sprint Spectrum has not slow-rolled its efforts to comply with the Commission's Order. The company is fully aware of its obligation to satisfy the Commission's requirements, but the effort has presented significant difficulties that the company did not anticipate. It has been making consistent progress toward meeting the Commission's Order, but the merger of Sprint into T-Mobile in 2021 has taxed the resources in the companies' billing departments. The company acknowledges and appreciates the Commission's patience and requests the Commission's indulgence for the short period until full compliance is attained.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Mark P. Johnson, hereby certify that a true and correct copy of the above and foregoing document was electronically served on all parties of record on this 16th day of December, 2021.

/s/Mark P. Johnson

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