

EXHIBIT Q

From: Gary I. Smith, Jr.
To: Kevin Reiss; Yu, Minae; Yin, Clifford; Monica McCarroll; Leong, Amber; Dallas, Melissa; Patch, Richard; Phan, Kim; Parker, Clara
Cc: Brass, Rachel S.; Higney, Caeli A.; Li, Viola; Renner Walker; Swathi Bojedla; Brendan P. Glackin; TMobile Merger AT
Subject: RE: Dale - Questions re DISH's subscriber-level structured data
Date: Tuesday, March 18, 2025 6:53:35 PM
Attachments: [image517480.png](#)
[image525908.png](#)
[external.png](#)
[first_time_sender_warning.png](#)

Kevin, do you mind answering this question more completely? We want to know also if there is a separate field for census block group, we understand there is zip code level data available.

Thanks!

1. Does DISH maintain data on subscribers' Census Block Groups and zip codes in its subscriber data that can precisely identify a subscribers' location? If so, please include those data fields in subscriber-level data and churn data. For the sake of clarity, Plaintiffs are seeking data on subscribers' Census Block Groups, not the more granular data on Census Blocks.

DISH's Response: The structured data contains a field named SUBSCRIPTION_ZIP_CODE. This field will contain information recording a subscriber's ZIP code.

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From: Kevin Reiss <kreiss@redgravellp.com>

Sent: Thursday, March 13, 2025 7:35 PM

To: Yu, Minae <MYu@gibsondunn.com>; Yin, Clifford <cyin@coblentzlaw.com>; Monica McCarroll <MMcCarroll@redgravellp.com>; Leong, Amber <aleong@coblentzlaw.com>; Dallas, Melissa <mdallas@coblentzlaw.com>; Patch, Richard <rpatch@coblentzlaw.com>; Phan, Kim <kphan@coblentzlaw.com>; Parker, Clara <cparker@coblentzlaw.com>

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Subject: RE: Dale - Questions re DISH's subscriber-level structured data



All,

Thank you again for coordinating to provide DISH with a single list of questions regarding its structured data.

Some prefatory background information might be helpful. As Plaintiffs are aware, on October 17, 2024, DISH provided Plaintiffs with a Data Dictionary for its proposed structured data fields. On October 28, 2024, Plaintiffs requested that DISH provide a sample of structured data (the “Data Sample”). DISH agreed to provide the Data Sample upon Plaintiffs’ execution of a data security agreement. Plaintiffs did not execute the data security agreement. Accordingly, DISH has yet to share the Data Sample.

Plaintiffs also asked several questions about DISH’s data fields and DISH responded on November 7, 2024. In its response, DISH explained that the Data Sample was an extract of a randomized sample of Boost Mobile subscribers from June 1, 2023, to October 31, 2024. The Data Sample contained five different sheets (since the information is maintained in different systems) that have a total of 72 separate fields. The Data Sample was organized in the following groups of information (data sets): subscriber data; account data; value added services data; bill ledger of the account; and usage data. Due to how the data is stored and extracted, the Data Sample fields are not an exact match with the Data Dictionary. Conversely and relatedly, because the Data Sample sheets were pulled from different systems, there are additional fields or modified field names not contained in the Data Dictionary. The foregoing would likewise be true for the structured data that DISH would produce from its Digital Operator Platform for Boost Mobile subscribers.

Please see DISH’s answers to your questions below.

T-Mobile’s questions:

1. Is there a field available in DISH’s subscriber level-data that captures whether a subscriber is an individual or an entity?

DISH’s Response: Each subscriber represents an individual line of service. Boost Mobile structured data does not capture whether a subscriber is an individual or an entity.

2. Is there a field available in DISH's subscriber level-data that captures demographic information related to the prices paid by the subscriber (e.g., discounts for AARP members and things of that sort)?

DISH's Response: Discount transactions are available in the bill ledger of the account data set. Discounts are recorded in the TRANSACTION_TYPE field. Possible values for this field include: boost_network_charge_discount; boost_non_network_charge_discount; or boost_invoice_discount. The reason for the discount, including whether the discount is for demographic reasons, is not captured by Boost Mobile structured data. Please note that boost_network_charge_discount and boost_non_network_charge_discount discounts are factored into the transaction amounts. The amounts captured by the boost_invoice_discount are not factored into the charge transaction amount, i.e., the charge amount value does not include these discounts.

3. Is there a field available in DISH's subscriber level-data that captures whether a subscriber purchased his or her device from DISH? Relatedly, is there a field that captures any device subsidies provided by DISH (i.e., free device, discounts on devices, BOGO offers, trade-in offers, etc.)?

DISH's Response: Boost Mobile structured data does not capture whether a subscriber purchased his or her device from DISH. Any discount on a device purchased directly from Boost Mobile will be captured in the bill ledger of the account data set. An account with a discount on a device purchased directly from Boost Mobile will have a value of either boost_non_network_charge_discount or boost_invoice_discount in the TRANSACTION_TYPE field. Device subsidies provided by Boost franchise retailers are not captured by Boost Mobile structured data.

4. Do the "BILLING TRANSACTIONS - TRANSACTION AMOUNT," "BILLING TRANSACTIONS - TRANSACTION TYPE," and/or "VALUE ADDED SERVICES" fields capture total monthly charges and show a breakdown of all components of those charges, such as base plan price, taxes, fees, charges and surcharges, penalties, promotions, discounts, refunds, subsidies, credits or any other applicable adjustments, including any one-time charges or credits?

DISH's Response: Total monthly charges are captured in the bill ledger of the account data set. If an account is prepaid, the TRANSACTION_TYPE field will have a value of either boost_network_charge or boost_non_network_charge. If an account is postpaid, the TRANSACTION_TYPE field will have a value of either boost_invoice_network_charge or boost_invoice_non_network_charge. Please note that the charge amounts for these discounts do not have the discount amount factored in, which is captured in the boost_invoice_discount TRANSACTION_TYPE. The bill_ledger of the account data set contains individual records for product charges, discounts, credits, and payments, including one-time charges and credits.

5. We don't see any subscriber-level cost data in the sample data fields. If DISH tracks costs at the subscriber-level, could you please provide us with a sample of that data? If, instead, DISH tracks costs at a higher level of granularity, we would like to see a sample of that less granular cost data.

DISH's Response: Subscriber-level cost data is not captured by Boost Mobile structured data.

6. Does the "VALUE ADDED SERVICES" field or any other field capture bundled services? What type of additional services would be reflected in the "VALUE ADDED SERVICES" field?

DISH's Response: A subscriber's products are reflected as separate line items in the structured data. Charges made to subscribers for all services (base plan plus value added services) are captured in specific data fields, including TRANSACTION_TYPE, which includes categories for charges in other fields including PRODUCT_NAME (which will include Value Added Services such as Device Insurance), PRODUCT_DESCRIPTION and TRANSACTION_AMOUNT.

7. Are there data fields that capture a subscriber's data, text, and voice allowances, respectively?

DISH's Response: To the extent Boost Mobile structured data captures this information, it is captured in the BASE_PLAN_DESCRIPTION field. This field contains a description of the subscriber's core/base retail wireless plan. Example value: "Unlimited Data, Talk & Text + 12GB/mo. Hotspot Each Line for up to 5 Lines (TI);" or "\$50 Unlimited Data, Talk & Text + 40GB of 5G/4G Data Each Line for up to 5 Lines (TI)."

8. Are there data fields that capture 1) the amount that a subscriber's data, text, and voice usages surpassed their respective allowances and 2) charges associated with those additional amounts?

DISH's Response: Boost Mobile does not charge its subscribers overage fees. As such, this information is not captured by Boost Mobile structured data.

9. Do the "IP NETWORK NAME" and/or "NETWORK PROVIDER NAME" fields capture whether or when a subscriber is using DISH's own 5G network? Relatedly, does the MNOIP indicator mean that a subscriber could be using any one of DISH 5G, TMO or ATT networks, but with no indication as to which specific network is being used?

DISH's Response: The Network Provider Name field will show the network on which a Boost Mobile subscriber has been provisioned. A Boost Mobile subscriber may be provisioned on the AT&T, T-Mobile, or DISH 5G Network, depending on a number of factors, including device, SIM card, and geographic location. As DISH continues its 5G network deployment and commercializes and grows customer traffic on its 5G Network, DISH has operated Boost Mobile primarily as a mobile virtual network operator (MVNO) and is transitioning to a mobile network operator (MNO). Boost Mobile subscribers that have compatible devices and SIM cards with its

5G Network in markets where it has reached voice over new radio (“VoNR”) are provisioned on the DISH 5G network. Under DISH’s “Intelligent Provisioning” system for accounting, the DISH 5G Network is referred to as “MNOIP” because DISH is operating as an MNO with respect to those customers. “MNOIP” has the same definition across data elements and refers to customers provisioned to DISH’s 5G Network. Subscribers will remain provisioned on the same network regardless of their location/roaming. Under its Master Network Services Agreement with T-Mobile and Network Services Agreement with AT&T, DISH may activate Boost Mobile customers who are not eligible for provisioning on the DISH 5G network onto the AT&T or T-Mobile networks for MVNO services. The Network Provider Name field for those customers will illustrate which network (T-Mobile or AT&T) the customer’s SIM card is assigned to and the IP Network Name field will illustrate which network the customer is assigned to for accounting purposes under DISH’s agreements with AT&T and T-Mobile, respectively. In practice, those values will be the same.

10. Is there a field available in DISH’s subscriber-level data that captures differences in the quality of services available to subscribers on the same plan?

DISH’s Response: “Differences in the quality of services available to subscribers on the same plan” is not captured by Boost Mobile structured data. We do not understand what T-Mobile is asking for in this question.

11. Does the “PORT IN FLAG” field capture which carrier the subscriber ported in from? Is there a field that captures port-out information?

DISH’s Response: The name of the carrier from which a subscriber ported in is not captured by Boost Mobile structured data. Boost Mobile structured data does not capture when a subscriber ports out to another carrier.

12. In response to document requests Nos. 6, 7, 8, 15, 16, 17, 23, 25, and 30, DISH responded that it would produce structured data. We do not think the structured data fields you’ve provided provides all the information sought by these requests. To the extent you disagree, please specify how the information sought would be reflected in the structured data fields you provided.

DISH’s Response: As stated above, the fields in the Data Dictionary and the fields in Boost Mobile structured data are not an exact match. We believe the answers DISH has provided in this email will answer this question as well. Please let us know if you have remaining questions regarding Boost Mobile structured data after your review of this email.

Plaintiffs’ question:

1. Does DISH maintain data on subscribers’ Census Block Groups and zip codes in its subscriber data that can precisely identify a subscribers’ location? If so, please include those data fields in subscriber-level data and churn data. For the sake of clarity, Plaintiffs are seeking data on subscribers’ Census Block Groups, not the more granular data on Census Blocks.

DISH's Response: The structured data contains a field named SUBSCRIPTION_ZIP_CODE. This field will contain information recording a subscriber's ZIP code.

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From: Yu, Minae <MYu@gibsondunn.com>

Sent: Thursday, March 6, 2025 1:30 PM

To: Yin, Clifford <cycin@coblenzlaw.com>; Monica McCarroll <MMcCarroll@redgravellp.com>; Leong, Amber <aleong@coblenzlaw.com>; Dallas, Melissa <mdallas@coblenzlaw.com>; Patch, Richard <rpatch@coblenzlaw.com>; Phan, Kim <kphan@coblenzlaw.com>; Parker, Clara <cparker@coblenzlaw.com>; Kevin Reiss <kreiss@redgravellp.com>

Cc: Brass, Rachel S. <RBrass@gibsondunn.com>; Higney, Caeli A. <CHigney@gibsondunn.com>; Li, Viola <VHLi@gibsondunn.com>; Renner Walker <rwalker@hausfeld.com>; Gary I. Smith, Jr. <GSmith@hausfeld.com>; Swathi Bojedla <sbojedla@hausfeld.com>; Brendan P. Glackin <bglackin@lchb.com>; TMobile Merger AT <TMobileMergerAT@hausfeld.com>

Subject: [EXTERNAL] Dale - Questions re DISH's subscriber-level structured data

Clifford and Monica,

As you've requested, we have combined the questions that T-Mobile and Plaintiffs had regarding the sample data fields that DISH provided. We note that Plaintiffs had only one question, which does not bear on any of the questions we sent. We've nevertheless combined the questions in a single email as you've asked us to do to move the discussion forward. As you know, we sent our questions last Monday, 2/24, and we understand that Plaintiffs sent their questions last Wednesday. We would appreciate DISH's timely response to our questions by no later than March 10, particularly given that you had these questions for over a week now, and there is no conflict or overlap that would have prevented you from timely starting on a response. We are happy to discuss by phone if helpful and look forward to your cooperation on this matter. Thank you.

T-Mobile's questions:

1. Is there a field available in DISH's subscriber level-data that captures whether a subscriber is an individual or an entity?

<!--[if !supportLists]-->2. <!--[endif]-->Is there a field available in DISH's subscriber level-data that captures demographic information related to the prices paid by the subscriber (e.g., discounts for AARP members and things of that sort)?

<!--[if !supportLists]-->3. <!--[endif]-->Is there a field available in DISH's subscriber level-

data that captures whether a subscriber purchased his or her device from DISH? Relatedly, is there a field that captures any device subsidies provided by DISH (i.e., free device, discounts on devices, BOGO offers, trade-in offers, etc.)?

<!--[if !supportLists]-->4. <!--[endif]-->Do the “BILLING TRANSACTIONS - TRANSACTION AMOUNT,” “BILLING TRANSACTIONS – TRANSACTION TYPE,” and/or “VALUE ADDED SERVICES” fields capture total monthly charges and show a breakdown of all components of those charges, such as base plan price, taxes, fees, charges and surcharges, penalties, promotions, discounts, refunds, subsidies, credits or any other applicable adjustments, including any one-time charges or credits?

<!--[if !supportLists]-->5. <!--[endif]-->We don’t see any subscriber-level cost data in the sample data fields. If DISH tracks costs at the subscriber-level, could you please provide us with a sample of that data? If, instead, DISH tracks costs at a higher level of granularity, we would like to see a sample of that less granular cost data.

<!--[if !supportLists]-->6. <!--[endif]-->Does the “VALUE ADDED SERVICES” field or any other field capture bundled services? What type of additional services would be reflected in the “VALUE ADDED SERVICES” field?

<!--[if !supportLists]-->7. <!--[endif]-->Are there data fields that capture a subscriber’s data, text, and voice allowances, respectively?

<!--[if !supportLists]-->8. <!--[endif]-->Are there data fields that capture 1) the amount that a subscriber’s data, text, and voice usages surpassed their respective allowances and 2) charges associated with those additional amounts?

<!--[if !supportLists]-->9. <!--[endif]-->Do the “IP NETWORK NAME” and/or “NETWORK PROVIDER NAME” fields capture whether or when a subscriber is using DISH’s own 5G network? Relatedly, does the MNOIP indicator mean that a subscriber could be using any one of DISH 5G, TMO or ATT networks, but with no indication as to which specific network is being used?

<!--[if !supportLists]-->10. <!--[endif]-->Is there a field available in DISH’s subscriber-level data that captures differences in the quality of services available to subscribers on the same plan?

<!--[if !supportLists]-->11. <!--[endif]-->Does the “PORT IN FLAG” field capture which carrier the subscriber ported in from? Is there a field that captures port-out information?

<!--[if !supportLists]-->12. <!--[endif]-->In response to document requests Nos. 6, 7, 8, 15, 16, 17, 23, 25, and 30, DISH responded that it would produce structured data. We do not think the structured data fields you’ve provided provides all the information sought by these requests. To the extent you disagree, please specify how the information sought would be reflected in the structured data fields you provided.

Plaintiffs’ question:

<!--[if !supportLists]-->1. <!--[endif]-->Does DISH maintain data on subscribers’ Census Block Groups and zip codes in its subscriber data that can precisely identify a subscribers’ location? If so, please include those data fields in subscriber-level data and churn data. For the sake of clarity, Plaintiffs are seeking data on subscribers’ Census Block Groups, not the more granular data on Census Blocks.

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