



October 12th, 2018

VIA ELECTRONIC FILING

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

RE: *Applications of T-Mobile US, Inc. and Sprint Corporation, WT Docket No. 18-197*

Dear Ms. Dortch:

On behalf of Mavenir Systems, Inc. (“Mavenir”), I would like to express our support for the merger of Sprint Corporation (“Sprint”) and T-Mobile US, Inc. (“T-Mobile”).¹ As a leader in accelerating and redefining network transformation to 5G for service providers around the world, Mavenir is excited about the opportunities for modernization and increased network investment made possible by the combination of these two companies into the New T-Mobile.²

Mavenir is a US-based Telecom software company that helps network operators deploy core and radio access network resources more quickly and more cost effectively. We support more than 250 communications service provider customers in more than 140 countries and our customers serve over 60 percent of the world’s mobile subscribers. As a key partner for T-Mobile to deploy new and innovative services, we recently worked with the company to successfully launch T-Mobile’s DIGITS service. We are the provider of T-Mobile IP Multimedia Core Network Subsystem (“IMS”) with IMS services like Wi-Fi calling, Voice over LTE (“VoLTE”), Video over LTE (“ViLTE”), and Rich Communication Services (“RCS”). In addition, we offer SMS, MMS and next-gen voicemail (including visual voicemail, voicemail to text, and voicemail to web) services to T-Mobile’s customers. We also provide various database, security and interconnect products like Session Border Controller (SBC), Security Gateway, SMS/DRA Firewalls, central store, etc. The merger will amplify T-Mobile’s ability to invest in delivering innovation to its customers and disrupt the market with new, cutting-edge offerings.

¹ *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations*, Public Interest Statement, WT Docket No. 18-197 (filed June 18, 2018) (“Public Interest Statement”).

² *See id.* at i.

New T-Mobile has announced that it intends to leverage the complementary spectrum, sites, and assets of T-Mobile and Sprint to build a robust, nationwide, world-class 5G network.³ Importantly, this network transformation involves migrating customers to a combined core to service the combined subscriber base and expand access to the leading-edge services that T-Mobile provides. To accomplish this, New T-Mobile will invest approximately \$40 billion over the next three years—three times the amount that T-Mobile would invest without the merger.⁴ New T-Mobile’s next-generation network will revolutionize the consumer experience by delivering high-capacity, high-speed services across the United States, including in rural and remote areas and customers will benefit from the added investment and innovative services in which T-Mobile has demonstrated leadership in deploying.⁵ This investment will enable New T-Mobile to build a platform for a nationwide 5G service that far exceeds the capabilities of any 5G network that either company could build on its own.⁶

The enhanced capabilities of the New T-Mobile network including the combined core, represent an important business opportunity for Mavenir and similar companies to grow the market for advanced network services. Perhaps even more importantly, we anticipate that New T-Mobile’s more expansive deployment and lower cost structure following the merger will motivate competitors, both in the US and globally to carefully study their own cost-per-bit models and network architectures and invest in the innovative technologies that Mavenir and other virtualization specialists offer.⁷

The Sprint and T-Mobile merger and resulting New T-Mobile’s goal to deliver a world-class 5G network sooner than otherwise possible promises to result in significantly increased network investment. At Mavenir, we welcome the opportunity to help communications service providers bring 5G technologies and services to market as soon as possible. For these reasons, Mavenir supports the merger and urges the Commission to approve the transaction without delay.

Respectfully submitted,

/s/ Pardeep Kohli

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cc: Chairman Ajit Pai (via email)
Commissioner Michael O’Rielly (via email)
Commissioner Brendan Carr (via email)
Commissioner Jessica Rosenworcel (via email)

³ See *id.* at i.

⁴ See *id.* at 15.

⁵ See *id.* at i-iii, 15-16.

⁶ See *id.* at 16-17.

⁷ Mavenir’s Cloud RAN, for example, can save mobile operators 49 percent in capital costs and 31 percent in annual operating costs, compared to traditional RAN implementations.