

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Applications of T-Mobile US, Inc. and )  
Sprint Corporation, ) WT Docket No. 18-197  
Consolidated Applications for Consent )  
to Transfer Control of )  
Licenses and Authorizations )

**COMMENTS OF  
HISPANIC INFORMATION AND TELECOMMUNICATIONS NETWORK, INC.**

Hispanic Information and Telecommunications Network, Inc. (“HITN”), hereby submits its Comments in support of the above-captioned transaction regarding the transfer of control of licenses and lease authorizations from Sprint Corporation to T-Mobile US, Inc. (“T-Mobile”). HITN, a non-profit corporation and programmer of HITN TV®, a Spanish language noncommercial programming channel, is also a holder of 2.5 GHz EBS stations across the United States, that are presently leased to Sprint. HITN was a founding EBS partner with Clearwire Corporation, Sprint Corporation’s predecessor in interest, in its initial efforts to develop a nationwide network to provide both commercial and educational mobile broadband on 2.5GHz spectrum within the United States. HITN has been involved with this educational/commercial partnership for over 15 years.<sup>1</sup> HITN sees the proposed merger with T-Mobile as the next critical step in the evolution of this endeavor,

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<sup>1</sup> Under its EBS 2.5 GHz excess capacity spectrum leases, HITN receives and distributes Sprint enabled devices to schools and libraries in the continental United States and Hawaii for access to its online digital services and for distribution to faculty, administrative staff and students in furtherance of their own educational missions. HITN uses funds generated from its leases to support the development and operations of its Spanish language educational programming service, as well as its online services and other educational projects and initiatives across multiple platforms.

which will create a portfolio of spectrum across bands that will enable the new merged entity to rapidly release the potential of 5G in both urban and rural areas.

### DISCUSSION

Hispanics currently make up around 18% of the total U.S. population, and represent the



HITN, established in 1981 as a non-profit organization, is dedicated to using telecommunications technologies for the advancement of the educational, cultural and socio-economic aspirations of Hispanic Americans in the continental U.S., Hawaii and Puerto Rico. Amongst its functions, HITN uses multiple platforms to provide educational, informative and cultural Spanish language video and broadband content to Spanish speaking Americans. *HITN TV* is a noncommercial Spanish language programming network that reaches 44 million homes across the United States over all major cable and satellite systems. *HITN Learning* produces high quality bilingual educational materials with an emphasis on mobile applications for mobile phones and tablets. HITN also manages [VidaySalud.com](http://VidaySalud.com), the largest Spanish-language health-information platform in the world.

Given the observed mobile broadband usage trends within the US Hispanic community, HITN has been increasingly interested in making its television programming and services readily available for smartphone access across high speed and robust mobile platforms. To this end, HITN recently released its HITN TV app that allows *HITN TV* subscribers access to a live stream of the network on mobile devices and further offers robust video-on-demand for *HITN TV's* most popular content.

While HITN as an EBS Licensee has contributed to and benefited from Sprint's 4G LTE deployments, HITN believes that the advent of 5G will unlock the potential of its EBS spectrum to provide the broadband services demanded by the US Hispanic community via a more robust mobile distribution system serving both urban and rural areas of the United States. A move to 5G will improve network speeds, boost network capacity, and lower the cost of broadband wireless services. Further it will assist EBS license holders and educators with the capacity and reach of provided educational broadband enabled devices.

Sprint has used its own spectrum portfolio, as well as 2.5 GHz EBS spectrum, leased from HITN and other educational and nonprofit entities, to build out several platforms including the now retired WiMax platform and its present 4G LTE network. The Sprint LTE network today provides broadband service to millions of postpaid and prepaid customers, as well as educational broadband service capacity to its EBS partners nationwide. Sprint has proved to be a good partner with HITN and with EBS licensees in general, by assisting educational efforts and increasing student access to online learning, by providing its partners with many thousands of mobile broadband devices for educational use. While Sprint's standalone plan for deploying 5G would launch nine markets in the first half of 2019, even Sprint has recognized that certain scaling and business realities coupled with the unique propagation characteristics of the 2.5 GHz band will slow its deployment into rural areas, where such robust broadband is dearly needed.<sup>6</sup>

Despite the great success of Sprint's efforts on its own to this point with regard to the deployment of 2.5Ghz spectrum on its networks and its positive record of partnering with the educational community to unleash the educational potential of those networks, HITN believes that Sprint's proposed merger with T-Mobile presents certain benefits that mitigate in favor of Commission approval of the application, provided that T-Mobile commits to a continued productive interactive partnership with its educational Lessors. First, Sprint and T-Mobile both acknowledge that a combined company would have a far better spectrum portfolio with which to maintain (without compromise) the existing 4G LTE service offerings, while rapidly deploying a 5G network on a nationwide basis.<sup>7</sup> Second, the particular mix of frequencies that would be held or controlled by the

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<sup>6</sup> *Transfer of Control Application from Sprint Corporation to T-Mobile US, Inc.* FCC File No. 0008224209 (June 18, 2018) Public interest statement at pp. 32 & 61 (*Public Interest Statement*) and Exhibit E, Declaration of John Saw, Sprint CTO ¶¶ 23 and 31.

<sup>7</sup> *Public Interest Statement* at p. 41-42. T-Mobile and Sprint estimate that they could cover to almost 90 percent of the U.S. population with speeds greater than 100 Mbps by 2024. *Public Interest Statement* at p. 59.

merged company would allow for a more effective and rapid deployment of 5G and high speed wireless broadband in rural markets that often have the most pressing need for better telecommunications services and communications technology.<sup>8</sup> Third, after this merger, the combined company would have more resources to invest in the 2.5 GHz band and the rapid deployment of 5G technology.<sup>9</sup> Fourth, the combined company would have a scale, subscriber base and resources that would better enable it to compete more aggressively with AT&T and Verizon than Sprint or T-Mobile ever could on their own.<sup>10</sup>

Therefore, provided that T-Mobile commits to a continued productive interactive partnership with its educational EBS Lessors, HITN urges the Commission to approve the proposed transaction as soon as possible.

Respectfully Submitted,

HISPANIC INFORMATION AND  
TELECOMMUNICATIONS NETWORK, INC.

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<sup>8</sup> T-Mobile and Sprint estimate that the combined entity will be able to increase wireless coverage in rural areas, reaching as many as 59.4 million rural residents and providing 45.9 million of those with download speeds of 10 Mbps or greater. *Public Interest Statement* at p. 66. T-Mobile has already committed to an expansion into additional rural markets by opening 600 new stores in sparsely populated areas of the United States. *Public Interest Statement* at p. 68.

<sup>9</sup> According to Sprint and T-Mobile, by 2024, the new network will have three times the total 5G capacity than either T-Mobile or Sprint could have achieved on their own, with speeds 4 to 6 times faster than could be achieved by Sprint's standalone network. *Public Interest Statement* at p. 18.

<sup>10</sup> The combined entity will use its expanded capacity and the resulting lower cost per customer to deliver lower prices and accommodate increased customer data usage at the same or lower prices. *Public Interest Statement* at p. 66