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October 31, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: Reply Comments  
WT Docket No. 18-197**

Dear Ms. Dortch:

The Enterprise Wireless Alliance (“EWA” or “Alliance”) submits the following Reply Comments in the consideration by the Federal Communications Commission (“FCC”) of the applications of T-Mobile US, Inc. and Sprint Corporation (collectively, the “Parties”) for consent to transfer control of licenses and authorizations in connection with the merger of the companies.<sup>1</sup> The Alliance is a trade organization representing the communications interests of a broad range of private enterprise and commercial entities. Its members operate self-provisioned wireless facilities for certain activities but, like the rest of the American public, also rely on nationwide or regional commercial wireless networks for other applications.

The Parties have provided ample documentation demonstrating that approval of their request would promote competition in the nationwide commercial wireless marketplace and accelerate the deployment of a 5G network covering much of the population of the country. That 5G network will host connected devices that constitute the Internet of Things, including, more specifically for EWA members, the Industrial Internet of Things (“IIoT”), that are becoming increasingly essential for American business. Access to low latency, reasonably priced IIoT capability for activities that can be conducted on commercial networks will address the current and future needs of a number of Alliance members whose broadband data demands continue to grow. For these reasons, EWA believes that the instant transaction is in the public interest and supports expeditious FCC approval of the merger.

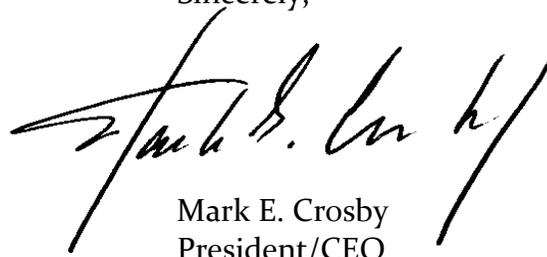
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<sup>1</sup> The Reply Comment deadline in this proceeding was extended until October 31, 2018. See Applications of T-Mobile US, Inc., and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197, *Public Notice*, DA 18-1012 (Oct. 2, 2018).

The parties contend that the new combined entity would have the combined assets and financial resources to better compete for enterprise business customers. EWA supports these efforts. We also agree with the parties that the diversified spectrum assets each brings to this transaction would be integral to their deployment of 5G services, which require a combination of low-, mid-, and high-band spectrum to provide both coverage and data capacity. In the event, however, that some form of spectrum divestitures are deemed necessary as the FCC considers this transaction, EWA urges the FCC to ensure that the spectrum is divested in such a way that it becomes available to both regional commercial and private enterprise applicants and not nationwide commercial carriers that already control very significant amounts of wireless spectrum.

EWA supports FCC approval of this transaction and looks forward to a prompt FCC decision in this matter, consistent with the recommendations herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is stylized and written in a cursive-like font.

Mark E. Crosby  
President/CEO