



March 13, 2019

Via Electronic Filing

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

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

Ms. Dortch:

As the founder and CEO of Northwest Broadcasting,¹ I understand how lack of competition in broadband places residents of small towns and rural areas on the wrong side of the digital divide. Without quality options, these communities struggle to attract investment, create sustainable jobs, and communicate with the outside world. A merged T-Mobile will have the necessary resources to build out its network in these towns, thus increasing both in-home *and* wireless broadband competition and breaking the monopolistic stranglehold that broadband providers currently have. In short, permitting T-Mobile and Sprint to merge simply represents good policy. Accordingly, I urge the FCC to approve the T-Mobile-Sprint merger.

Rural Americans' current lack of broadband options is undeniable. An estimated 24 million Americans—roughly 8% of the U.S. population—do not have access to fixed terrestrial high-speed broadband service in their homes. Approximately 14 million Americans, or 25% of the rural population, do not have access to mobile LTE broadband with download speeds of 10 Mbps or more. According to the FCC, almost 10 million rural Americans lack access to at least three LTE providers. Making matters worse, the digital divide is widening—while urban areas saw an almost 9% increase in mobile LTE deployments capable of 10 Mbps downloads between 2014-2016, deployment in rural areas remained flat.

A merged T-Mobile and Sprint will reverse this trend. Economies of scale and complementary spectrum will allow a merged T-Mobile and Sprint to invest nearly \$40 billion and aggressively

¹ Northwest Broadcasting owns broadcast stations in small towns across the United States, including: WICZ (Binghamton, NY); KMVU (Medford, OR); KFBI (Medford, OR); KAYU (Spokane, WA); WSYT (Syracuse, NY); KSWT (Yuma, AZ and El Centro, CA); KYMA (Yuma, AZ and El Centro, CA); WNYS (Syracuse, NY); WBPN (Binghamton, NY); KVIQ-LD (Eureka, CA); KIEM (Eureka, CA); KPVI (Idaho Falls and Pocatello, ID); WABG (Greenville, MS); WXVT-LD (Greenville, MS); WNBD-LD (Greenville, MS); KMCW (Medford and Klamath Falls, OR); KFFX (Yakima and Tri-Cities, WA); KCYU (Yakima and Tri-Cities, WA); KLAX (Alexandria, LA); and KWCE (Alexandria, LA).



build a network that reaches over 95% of the nation's rural population, thus dramatically expanding coverage. Signal quality and speeds will increase, too. The new T-Mobile intends to deploy 5G service with data rates of greater than 100 Mbps to two-thirds of the U.S. population by 2021, which would allow rural residents to take advantage of higher-bandwidth services. This nationwide 5G network will allow the combined company to compete more directly with AT&T and Verizon, and American consumers will experience the downstream benefits of this arms race.

T-Mobile and Sprint also have stated their intention to use the merged company's 5G network to disrupt the in-home broadband market. For small towns and rural areas, this will be a game-changer. The presence of an additional competitor in the broadband market would dramatically improve options for businesses and homes in small towns, where broadband buildout has been, at best, depressingly slow. T-Mobile and Sprint clearly recognize that these areas represent a market opportunity and estimate that the new T-Mobile's broadband offering will serve as many as 9.5 million households, 25% of which will be located in rural areas. Millions of small-town customers, frustrated with their lack of options, are waiting for this additional choice. I predict that the new T-Mobile's initial rollouts of this broadband service will demonstrate the level of pent-up demand for a consumer-centric alternative.

Finally, the new T-Mobile will create jobs in small towns and rural areas. The merged company has committed to opening 600 new retail stores and 5 new customer experience centers, which will translate to over 12,000 jobs in rural areas. New T-Mobile's investment and presence in small-town America will create broader economic benefits, providing broadband infrastructure for businesses and residents and indirectly creating tens of thousands of jobs.

For the reasons above, I support the merger between T-Mobile and Sprint and urge the FCC to approve the transaction.

If you have any questions, please feel free to reach out.

Respectfully submitted,

/s/ Brian Brady

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cc: (via email)
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Commissioner Michael O'Rielly
Commissioner Brendan Carr
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