

licensees and Sprint have forged public-private partnerships through which Sprint has deployed on 2.5 GHz spectrum to serve millions of consumers while EBS licensees use the spectrum to serve the educational needs of their constituents. In the Commission’s concurrent proceeding regarding the 2.5 GHz band, NEBSA and CTN provided examples of how the relationships between EBS licensees and Sprint have enhanced deployment of technology in educational environments, such as reducing the homework gap.¹ In that same proceeding, Sprint has emphasized the importance of its leased 2.5 GHz spectrum and its “long-standing mutually beneficial partnership” with the EBS community.²

Sprint and T-Mobile have urged the Commission to approve the merger so that the combined company may utilize its combined assets to construct robust 5G networks more quickly than either company could deploy on its own.³ Sprint specifically explains that the merger will permit Sprint to dedicate more of its 2.5 GHz spectrum to 5G deployments.⁴ The merger parties also indicate that, by combining Sprint’s spectrum capacity with T-Mobile’s territorial reach, their 5G network will cover a greater geographic footprint, including rural areas.⁵ As noted above, many EBS licensees lease their 2.5 GHz spectrum to Sprint and, in turn, rely on the Sprint network to provide a variety of educational services. To the extent that the merged entity will facilitate 5G networks being deployed more quickly and across the nation, EBS licensees and

¹ National EBS Association and Catholic Technology Network Joint Comments at 6-7, WT Docket No. 18-120 (filed Aug. 8, 2018).

² Sprint Corporation Notice of Ex Parte Presentation at 1, WT Docket No. 18-120 (filed Oct. 15, 2018).

³ See FCC File No. 0008224209, Description of Transaction, Public Interest, and Related Demonstrations (June 18, 2018, amended July 5, 2018).

⁴ *Id.* at 20-23.

⁵ *Id.*

their educational constituents will benefit by having access to faster and more robust networks that rely on 2.5 GHz spectrum. Further, educators in rural areas who struggle with the lack of high-speed and ubiquitous broadband access will benefit to the extent the merged company will better reach rural areas than Sprint would on its own.

NEBSA and CTN have discussed the proposed merger with Sprint and have been assured that EBS licensees will benefit through advanced 5G services and products that they could procure under their lease agreements, including IoT and virtual reality devices used to support education.⁶ NEBSA and CTN have also discussed the effects of the proposed merger on EBS licensees and leases with T-Mobile. While we appreciate that only limited discussions are possible pre-merger, T-Mobile has acknowledged its commitment to continuing mutually-beneficial relationships with the EBS community as an important aspect of using the 2.5 GHz spectrum productively. In addition, T-Mobile has stated that the merged entity's network investments, including expansion of network operations on 2.5 GHz spectrum, will allow the EBS community to take advantage of greater educational opportunities and better coverage. Accordingly, NEBSA and CTN have been assured by both merger parties that the EBS licenses and lease relationships, including the educational services provided through those leases, will remain an important part of the merged entity's operations. Given these promised benefits and the anticipated expansion of technology for education, NEBSA and CTN encourage the Commission to approve the merger.

⁶ *Id.* at 74 (“large enterprises and government and educational institutions are likely to be at the leading edge of the IoT adoption and integration curve...”).

Respectfully submitted,

NATIONAL EBS ASSOCIATION

By: [/s/ Todd D. Gray](#)

Todd D. Gray
Gray Miller Persh LLP
1200 New Hampshire Avenue, NW
Suite 410
Washington, DC 20036
202-776-2571
tgray@graymillerpersh.com

CATHOLIC TECHNOLOGY NETWORK

By: [/s/ Edwin N. Lavergne](#)

Edwin N. Lavergne
Donna A. Balaguer
Fish & Richardson P.C.
1000 Maine Avenue, SW, Suite 1000
Washington, DC 20024
202-626-6359
lavergne@fr.com

October 31, 2018