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

Re: Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations; WT Docket No. 18-197
3/25/19

Dear Secretary Dortch:

I have no objection to T-Mobile and Sprint licenses and operation consolidation. I also would not be surprised even if the applications get denied eventually. I like to share my thoughts, concerns and comments with you and the public.

As a consumer, I am ok with the thirty to forty dollar per month unlimited voice and data plan now. It is cheaper than most of other utility bills I need to take care every month. The merge could give less motivation for T-Mobile and Sprint to drive the competitive prices further down. But I don't expect the wireless service charge could go up. The carriers may increase the prices while 5G service is available. But I don't think it shall be much. The 5G wireless service costs are very likely in the same level with 4G service. In long run, I see the potential 5G service would be cheaper than current 4G service. The cheaper costs for consumers are not only based on carrier competition. It is also on the competition between equipment and device makers.

Regarding the retail stores and service distribution agents, the MVNO operators and third party retail stores have very high competition. The merge shall not have much impact at this part. Even the pre-paid and post-paid stores from same carrier competes each other.

It is hard to quantify what is right competition level. I believe the goal is higher efficiency and fair play. In the city areas, the high network traffic and high density population can support higher competition, such as hundreds of wireless retail stores in Manhattan New York City can survive. The same things cannot happen in rural Kansas. The city and rural areas shall apply to different business models. Over competition in rural area could be damage.

My personal opinion, Sprint needs the merge more than T-Mobile. The delay of Sprint restructure shall devalue Sprint's asset. If Sprint had to destructure without proper arrangement such as merge with T-Moible, it would be painful for Sprint employees and its customers. T-Mobile needs Sprint's cell-sites and spectrums to strength its position. The competition among Verizon, at&t and new T-mobile shall be more intensive than before rather than less. The balanced competition can keep the US as the world 5G center stage of innovation.

T-Mobile's latest update gives a lot of details on its fix broadband wireless for rural homes. The concept brings internet connection and video content providers to the competition. It is impossible to picture the results after 5 years. But I can say, the less competition assumption is going to be less concern by time. The re-stable point shall not be realized in 8 years. Any change can be happened in 3 to 8 years. There are many ways to re-regulate the markets if it is necessary. The merge can stimulate the changes by technologies and operation. It is important for the government to spark innovation opportunities and prove to the public the right decision is being made.

I noticed a lot of smaller telecom companies are as worry as the big ones. Regardless the merge, the problem is none of the big companies will automatically cooperate with smaller companies. Shall 5G redefine the interconnection between telecom companies? Shall O-RAN not only have the carriers can choose wireless transceivers freely but also open the big carrier's networks to be able to easily access by smaller companies?

When we take a look of the bigger pictures, the decisions would be easier to be made. I'd rather let the merge go and have time to think about the future, such as 5G, new service, new network structure, giving private network some rooms to grow, IOT and etc.

Besides carriers were consolidated, the 4G/5G equipment makers have only handful stay on their feet now.

Last month, Japanese e-commerce firm Rakuten plans to become Japan's fourth mobile operator this year with what it says the world's first fully cloud-based mobile network, creating a potential template for international expansion. Cisco, Intel and Nokia are among project partners. Altiostar, a U.S. startup is to provide the software-defined radio part of the Rakuten project. I expect these kinds of innovation shall dramatically reduce the carrier equipment cost and operation workload. In the same time, carriers are unnecessary to be locked to certain equipment providers.

Recently, AT&T CEO said Huawei makes it difficult for carriers to swap 5G equipment. Interoperability has been always a major concern in cellular network. It is time to break the barriers.

We would hope the T-mobile new business model can trigger some big innovation and have the USA firms to lead the 5G industry in next 10 years.

If 5G can be considered as technology and social revolution driver, we shall bring more industrial players in the playground rather than the handful of carriers and equipment makers. Having 5G provide wireless broadband internet service for household and business is only one of the innovation fields. In case the T-Mobile proposed business model works, the other wireless carriers can do the same things without thinking. The cable companies who hold frequency spectrum license shall be able to provide wireless broadband to its customers too.

The Internet of Things shall bring in a lot more companies to involve in the changes. The endless changes in wireless industry in the past 25 years are unbelievable. The innovation and intensive competition are the last aspects which are needed to be worried about. There are so many "ready" technologies are ready but haven't get chances to be implemented yet. The global collaboration, competition and involving are exciting. The Merge or Not cannot stop the competition at all. Though I think merge is make sense. The worst case is "holding". The impact would be much less than we thought. While some other companies thought the changes and innovation in wireless industry is ending, I am glad to see that T-Mobile and Sprint are still focus on technologies rather than adding other contents. It is true the wireless technology has been changing the way people getting news and social contents. But T-Mobile and Sprint merge is purely technology and operation efficiency driven.

Again, I believe the merge shall not cause less competition. Some other reasons may be about to be found to block the merge, but less competition shouldn't be one of those.

Sincerely,

Kun Su