



May 3, 2019

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Chairman Ajit Pai

Federal Communications Commission

1445 12th Street, S.W.

Washington, D.C. 20554

Re: Proposed Transfer of Control of Sprint Corporation to T-Mobile US, Inc.,
WT Docket No. 18-197

Dear Chairman Pai:

The California Emerging Technology Fund (CETF) respectfully urges the Federal Communications Commission to approve the pending merger of T-Mobile US, Inc. and Sprint Corporation in the above-referenced docket for the detailed reasons set forth below.

As you may recall from our prior meetings, CETF is a non-profit organization created in 2006 by the California Public Utilities Commission (California PUC), whose mission is to close the Digital Divide in California. A new state law (California Assembly Bill 1665) requires the California PUC to adopt policies to reach 98% of all California residences in every region with broadband infrastructure and to achieve 90% home broadband adoption by 2023. CETF works towards these goals through public policy, awareness and education, digital inclusion programs, and grantmaking to non-profit community organizations and public agencies. CETF has participated in proceedings before both at the FCC and the California PUC to ensure that mergers between California communications providers generate verifiable public benefits.

CETF intervened as a legal party in the California PUC docket requesting a transfer of control of Sprint to T-Mobile. CETF Special Counsel, Rachele Chong, former FCC and California PUC Commissioner, fully participated in the week-long evidentiary hearing so that CETF could evaluate the detailed application and testimony of the joint applicants and the consumer representatives. CETF expressed our concern that the merger bring significant public benefits to our residents that are appropriate, quantifiable and comparable to past similar communications mergers, particularly in the area of broadband access, broadband affordability, and digital adoption initiatives for unconnected households, especially those that are low-income or disadvantaged.

As we reported to the California PUC in a motion, CETF is pleased to inform you and your fellow commissioners that CETF negotiated a very advantageous Memorandum of Understanding (MOU) with T-Mobile that we strongly endorse because it will bring positive benefits to millions of consumers.

Key to our support for the merger is the fact that the combined spectrum and infrastructure assets of the two companies will bring important 5G service to Californians more quickly than Sprint or T-Mobile could accomplish as standalone entities. Furthermore, the combined network will bring significantly better and faster wireless coverage to most of rural California, which will make significant progress towards the 98% coverage goal set forth in state law. CETF took a “trust-but-verify” approach on wireless coverage. In a test protocol defined under the MOU, these wireless network upgrades will be verified by an independent third-party testing firm to ensure that the 5G network—with its promised coverage of rural areas and speeds—will be delivered by New T-Mobile.

Equally important, T-Mobile made significant commitments to: (1) enhance its emergency communications, which will benefit first responders and disaster victims in our state; (2) fund digital literacy training programs for unconnected households, including in schools serving low-income and disadvantaged students; (3) actively market in-language and in-culture affordable plans to target low-income communities; (4) offer for at least five years Lifeline plans with free handsets, affordable rates, and robust data plans to eligible low-income households; and (5) bring a thousand new jobs in a state-of-the-art customer care center, should the transaction close.

As a result, CETF and our community-based organization partners strongly support the proposed merger of Sprint and T-Mobile and urge rapid approval. CETF is confident that the combination of the two companies will bring substantial and verifiable public benefits to millions of consumers.

With kind regards,



Sunne Wright McPeak

President and CEO

California Emerging Technology Fund



Rachelle Chon

Special Counsel to CETF

Former FCC and California PUC

Commissioner

C: Commissioner Michael O’Rielly
Commissioner Jessica Rosenworcel
Commissioner Brendan Carr
Commissioner Geoffrey Starks
Donald K. Stockdale, FCC
David B. Lawrence, FCC