

To the Federal Communications Commission:

PCs for People is a national 501(c)(3) nonprofit organization that provides much-needed technology and support services to qualifying low-income individuals and families in all 50 states. We have distributed more than 260,000 computers, connected over 40,000 low income households, and recycled over 3.5 million pounds of electronics. We initially served low-income Twin Cities residents, but in 2016, we began serving low-income families in all 50 states. Today, we have offices in the Twin Cities and Mankato, MN; Denver, CO; and Cleveland, OH.

PCs for People has partnered with nonprofit Educational Broadband Service (EBS) licensees, Mobile Beacon and Mobile Citizen, to help eligible income-qualified individuals and families below the 200% poverty level obtain affordable refurbished computers and home internet access. Low-income families need access to both a computer and internet access at home to benefit from the life-changing impact that access to technology provides. Our partnership with EBS licensees enables us to supplement our core service—providing affordable, refurbished computers—with internet access that is essential to make full use of technology in their homes.

I'm writing today to add PCs for People's voice in concern to the T-Mobile/Sprint merger as it is currently proposed. T-Mobile has made no public commitment to uphold EBS lease agreements or maintain existing levels of broadband service under these leases on a post-merger T-Mobile network. This lack of commitment threatens the internet service that more than 128,000 low-income individuals rely on today through our program. Furthermore, it has the potential to cripple our ability to continue to combat the digital divide and homework gap if the service plans we currently obtain through Mobile Beacon and Mobile Citizen were suddenly reduced.

Our concerns are not merely hypothetical.¹ After Sprint's acquisition of Clearwire in 2013, we went from having access to unlimited data plans through Mobile Beacon to a data-capped 6 GB/month plan—which was far below the average data usage (30 GB/month) our families used and needed. Additionally, while we previously could purchase desktop modems through Mobile Beacon, we were suddenly limited to mobile hotspots and USB modems, which have less reliable in-building service than desktop modems. This put at risk the internet service that 14,000 low-income Twin Cities households—with 26,000 school-age kids---relied on.

While Mobile Beacon and Mobile Citizen were eventually successful in winning a court order that allowed our low-income families to transition to Sprint's LTE network and maintain existing levels of service without a low data-cap,² litigation and emergency injunctions do not guarantee a smooth, reliable path for our low-income families if the merger is approved. It is deeply troubling to us that T-Mobile has refused to make a firm commitment to uphold EBS leases and existing levels of service. Additionally, we understand that T-Mobile's publicly-stated plans include using Sprint's 2.5 GHz spectrum exclusively for 5G,³ but it has provided no explanation or assurances about what will happen to existing 4G users on Sprint's network, particularly our subscribers who have few, if any, viable alternatives for internet access.

¹ See <https://www.twincities.com/2015/10/07/disadvantaged-twin-cities-households-face-loss-of-internet/>. See also <https://www.twincities.com/2016/03/31/once-threatened-low-cost-internet-gets-new-life-in-twin-cities/>.

² <https://www.mobilebeacon.org/wp-content/uploads/2015/11/MB-11-11-237Memorandum-Decision.pdf>

³ See e.g., T-Mobile Description of Transaction, Public Interest Statement, and Related Demonstrations, WT Docket 18-197 (June 18, 2018) at 37.

Indeed, according to a 2017 survey, 73% of households subscribing to our service had never had home broadband before.⁴

In 2015 when WiMAX users on Clearwire's network needed to transition to Sprint's post-merger LTE network, 14,000 Twin Cities low-income households were at risk. Today, absent a firm commitment from T-Mobile, that same risk applied to more than 40,000 low-income households in 50 states that have high-speed, reliable internet service that they may not otherwise afford. On average, PCs for People subscribers have 3.2 individuals, including 1.8 children, per household, surviving on an average income of \$14,000 per year. Without our service—which is only made possible through existing EBS leases and current EBS rules—children in these households would fall further behind the homework gap, and parents and other adults in the home would be unable to take online courses, apply for a job, or develop other in-demand workforce skills. All of this only serves to perpetuate the cycle of poverty.

Lastly, we reiterate our concerns with the proposed changes to EBS rules that the Commission is considering in a parallel rulemaking proceeding.⁵ We agree with comments filed by Mobile Beacon that if existing eligibility were eliminated and the T-Mobile/Sprint merger is approved, the viability of our existing program and our ability to continue to offer robust, affordable, uncapped broadband service over the long-term is very much at risk.⁶ Absent the educational eligibility and use rules that provide incentives for commercial operators to partner with educational institutions and nonprofits like Mobile Beacon and Mobile Citizen, successful programs that provide broadband access to economically disadvantaged populations, like those provided by Mobile Beacon and Mobile Citizen, will cease to exist. There are serious considerations that overlap the EBS rulemaking proceeding and the pending merger application, and we believe that the resolution of the merger proceeding has critical implications for the Commission's rulemaking decision.

Sincerely,



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⁴ Samantha Shartman-Cycyk & Katherine Messier, *Bridging the Gap: What Affordable, Uncapped Internet Means for Digital Inclusions* (2017), https://www.mobilebeacon.org/wp-content/uploads/2018/05/MB_ResearchPaper_FINAL_WEB.pdf.

⁵ <https://ecfsapi.fcc.gov/file/10808097948192/Comments%20of%20PCs%20for%20People%20on%20EBS%20NPRM.pdf>

⁶ North American Catholic Educational Programming Foundation, Inc. and Mobile Beacon, *Written Ex Parte Presentation, WT Docket 18-197 (April 2, 2019)* at 4-7.