



May 23, 2019

BY ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**RE: Ex Parte Notice. Applications of T-Mobile US, Inc. and Sprint Corporation for
Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197**

Dear Ms. Dortch:

On May 21, Debbie Goldman and Hooman Hedayati of the Communications Workers of America (CWA), Phillip Berenbroick of Public Knowledge, and Dr. Andrew Afflerbach, CEO & Chief Technology Officer at CTC Technology & Energy, held a telephonic meeting with William Davenport, Commissioner Geoffrey Starks' Chief of Staff & Senior Legal Advisor for Wireless and International, to discuss the above-captioned proceeding.

The meeting focused on T-Mobile and Sprint's commitments detailed in their May 20, 2019 ex parte letter.¹ Ms. Goldman reiterated that the commitments and conditions do nothing to address CWA's concerns about the impact of this merger on T-Mobile and Sprint workers and consumers. The merger will still result in elimination of 30,000 U.S. jobs as the new T-Mobile shuts down duplicative retail stores and consolidates headquarters functions. T-Mobile has made no written, verifiable commitments to the FCC to protect jobs.

Ms. Goldman and Dr. Afflerbach emphasized that the companies' rural promises are overstated and don't hold up to scrutiny. T-Mobile and Sprint's own filings with the FCC show that even six years after the merger, 40 million Americans -- mostly in rural communities -- would still not have access to the New T-Mobile's high-speed 5G wireless network. Prior to the new commitments, 45.9 million Americans would not have had access to the New T-Mobile's high-speed 5G wireless network.

Mr. Berenbroick reiterated that even with the new conditions, the combination of T-Mobile and Sprint will still result in substantial price increases for wireless consumers. These

¹ See Letter from Regina M. Keeney and Nancy J. Victory to Marlene H. Dortch (May 20, 2019), available at [https://ecfsapi.fcc.gov/file/10520302189557/Redacted%20FCC%20Commitments%20Ex%20Parte%20\(05.20.2019\).pdf](https://ecfsapi.fcc.gov/file/10520302189557/Redacted%20FCC%20Commitments%20Ex%20Parte%20(05.20.2019).pdf).

higher prices will fall especially hard on low-income and prepaid customers who are least likely to be able to afford to pay higher prices and most likely to rely entirely on their mobile subscription for internet access. Furthermore, divesting Boost Mobile, Sprint's prepaid brand, will do nothing to benefit prepaid customers, as Boost is currently just another brand name for a service that uses Sprint's network on the back end. In addition to substantially reducing competition in the wireless retail market, combining T-Mobile and Sprint will dramatically concentrate the wholesale market. As a result of the combined firm's enhanced market power, rural telecommunications providers and MVNOs are likely to pay higher prices for wholesale service, and those higher prices will ultimately be passed on to consumers.

Ms. Goldman and Mr. Berenbroick noted that they are continuing to review the Applicants' May 20 ex parte letter and intend to submit a more detailed analysis into the record.

Sincerely,

A handwritten signature in cursive script, reading "Debbie Goldman".

Debbie Goldman
Telecommunications Policy and Research Director
Communications Workers of America

cc: William Davenport
Kathy Harris
Jim Bird
Linda Ray,
David Krech
Catherine Matraves