



June 29, 2021

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Re: *Application for Consent to Transfer Control of International Section 214 Authorization, GN Docket No. 21-112*

Dear Ms. Dortch:

On June 25, Ronan Dunne, CEO of Verizon Consumer Group, and Eduardo Diaz Corona, CEO of TracFone, along with Kathy Grillo, Senior Vice President of Public Policy & Government Affairs at Verizon, and Richard Salzman, General Counsel of TracFone, met via teleconference with Acting FCC Chairwoman Jessica Rosenworcel and Acting Chief Counsel Umair Javed, regarding the pending application seeking approval of Verizon's acquisition of TracFone from América Móvil.

During the meeting, the applicants described how the Transaction is in the public interest, because a combined Verizon and TracFone will better serve existing and potential TracFone customers and inject further competition into the prepaid segment for value-conscious customers. Consumers will benefit as the number of facilities-based providers in the prepaid segment effectively moves from two to three. Mr. Dunne described how Verizon is eager to grow TracFone and emerge as a competitive force in the prepaid sector, in particular for value-conscious consumers. As the applicants have explained, the combined company will continue to offer low-cost offerings—TracFone customers will be able to remain on their current plans post-closing. But the Transaction will also allow the combined company to introduce new, compelling offerings—for example, 5G devices and services—at prices that a standalone TracFone cannot offer.

Mr. Diaz Corona described how equipping TracFone with a network will lower TracFone's costs, allowing it to leverage owner's economics, just as T-Mobile's Metro and AT&T's Cricket do today, to offer value-conscious consumers more competitive plans; make TracFone more nimble in responding to consumer demands and competitive offers, rather than having to negotiate arm's length deals with multiple underlying network operators; and deliver a new level of device-buying power to TracFone, resulting in better deals for TracFone's customers.

Mr. Dunne also specifically addressed Lifeline. Verizon is firmly committed to TracFone's Lifeline business and the consumers it serves. After the Transaction is approved and

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closed, Verizon will continue to offer TracFone's current Lifeline-supported services; TracFone customers will be able to keep their current Lifeline service/plan when the deal closes. Notably, here too the Transaction will increase facilities-based competition, introducing a second facilities-based competitor for Lifeline customers. Today, while there are a number of MVNOs that offer wireless Lifeline-supported services, there is essentially only one network operator that does so: T-Mobile.

Verizon and TracFone also reiterated that the Transaction will allow Lifeline customers and other prepaid customers to benefit as Verizon's networks and services continue to advance. Within 6 months after the Transaction closes, Verizon will make available a service plan to Lifeline and other prepaid customers through TracFone that includes 5G service. In addition, to help customers take advantage of the benefits of 5G, Verizon will increase the range of cost-effective 5G devices available to these consumers using commercially reasonable subsidy practices supported by regulatory flexibility.

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Pursuant to Section 1.106 of the Commission's rules, a copy of this letter his being submitted in the record of this proceeding. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Alejandro Cantú Jiménez

Alejandro Cantú Jiménez  
General Counsel  
América Móvil, S.A.B. de C.V.  
Lago Zurich 245  
Plaza Carso/Edificio Telcel, Piso 16  
Colonia Ampliación Granada, Miguel Hidalgo  
México, D.F. 11529  
+ 52.55.2581.3700 (tel.)  
acantu@americamovil.com

/s/ William H. Johnson

William H. Johnson  
Verizon Communications Inc.  
1300 I Street, NW, Suite 500E  
Washington, DC 20005  
202-515-2492 (tel.)  
will.h.johnson@verizon.com

Richard B. Salzman  
Executive Vice President  
and General Counsel  
TracFone Wireless, Inc.  
9700 NW 112th Ave  
Miami, FL 33178-1353  
305-715-6500 (tel.)  
RSalzman@tracfone.com