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Federal Communications Commission
Comment in Regards to Proceeding 18-197
445 12th St SW
Washington, DC 20554

Dear Federal Communications Commission:

I have been a T-Mobile customer for over seven years. In this time, T-Mobile has made significant strides in both the coverage of their network, their offerings to consumers, customer service, pricing, and more. However, despite these improvements, T-Mobile is fighting two major carriers – Verizon and AT&T – tooth-and-nail, spending large amounts of revenue to expand their network in both speed and coverage.

Despite these efforts, T-Mobile is still considerably behind Verizon and AT&T. These are the reasons in my opinion:

- Verizon was founded in the year 2000, ironically by one of the largest mergers in U.S. history. This positioned them to be able to build out a comprehensive network across all of the United States using (what is now considered obsolete) the CDMA cellular standard. This standard allows better penetration of cellular signals into buildings and travels further. Furthermore since Verizon had a significant head start over T-Mobile (founded in 2002). T-Mobile currently uses, and has always used, the GSM standard – a global standard employed by the overwhelming majority of countries in the world. Unfortunately, the GSM standard does not penetrate buildings as well, and travels significantly shorter distances. On the surface it would appear that a company should chose to use CDMA, but because it is obsolete and the standard is no longer being expanded with new features, T-Mobile should be given the consideration that it has always kept in-line with global standards – a commendable action. Expanding T-Mobile's network (as well as AT&T's) is significantly more costly than Verizon's.
- Since T-Mobile's network expansion was behind Verizon's (for the above reason, and others) when the 3G/4G boom came, T-Mobile immediately had to pivot from just expanding its network to also upgrading all existing cellular towers and repeaters to support 3G/4G, then LTE (since T-Mobile was the only carrier to actually bother implementing HSPA+ as "4G" first). Verizon did not suffer as badly from this 3G/4G boom on its network's coverage since it pretty much had covered the overwhelming majority of the United States by that time, ahead of all other carriers. While it's true that Verizon then had to implement the GSM

standard and equipment needed to support LTE on all of their existing towers, contracts were already in place for leases on property for their cellular towers as well as workers in each region to work on them.

- AT&T experienced an enormous boom in its coverage when it was the first and only carrier to allow the iPhone on its network. T-Mobile was not in a position financially at the time to be able to negotiate against AT&T for the iPhone exclusivity.

As you are also aware, T-Mobile was the recent high-bidder of the lowest (Hz) and most sought-after frequency in the FCC's spectrum auction. Despite this, T-Mobile needs the infrastructure that Sprint can provide, which includes contacts with existing companies/individuals for property to place their cellular towers on; and Sprint's existing investment into coverage.

It is true that the topic at hand is the safety of consumers by encouraging competition in the market place, but – in my opinion – a stronger T-Mobile with greater coverage will actually spur the industry into more fierce competition, **not** degrade it. Verizon now has very little *true* competition, in the sense of another company that can go head-to-head with all of its offerings: coverage, speed, *and* reliability. By allowing T-Mobile to merge with Sprint, it is my very strong opinion that it will benefit consumers, not hurt them.

As a final note to this letter, I feel it important to explain that I have never written a letter to a request for public comment, nor am I a pro-corporation or conservative individual. Furthermore, I am a highly experienced software developer/engineer (since age 13) and have a strong interest in cellular technology and expansion. I also very strongly encouraged the anti-trust lawsuit against Microsoft in the late 90's as well as being against the current monopoly that Apple has in the cellular device/OS arena. Given these factors, it should speak volumes about the strength of my opinion and my subject matter expertise when I voice my opinion in allowing T-Mobile to merge with Sprint.

Sincerely,
Nick Betcher