The proposed T-Mobile-Sprint merger is completely illegitimate. Both parties claim that it would result in greater nationwide competition, greater jobs, greater innovation and better spectrum holdings, and etc. This merger would not result in more competition because there are only four major nationwide wireless carriers in the United States of America that operate their own network on a nationwide level. There are high barriers to entry in the wireless industry, which is why for years we do not have a new wireless carrier that delivers its own network service on a nationwide level. T-Mobile and Sprint both claim that they need more spectrum to meet the growing demand for wireless data usage, to deploy and deliver better 5G service in the future and to stay ahead of competition coming from China. T-Mobile’s merger with Sprint would not give them greater spectrum overall because T-Mobile would also acquire Sprint’s customers and therefore the spectrum holdings per customer will not increase. Do you remember when AT&T proposed to merge with T-Mobile back in 2011 and how many benefits both parties claimed would only come from the merger and not come about without the merger. Since the AT&T/T-Mobile merger was blocked successfully by the FCC and by the Department of Justice back in 2011, the results after that until this day were highly with merit because there was more competition and more consumer choices. One very important thing to note is that the blocked T-Mobile merger with AT&T resulted in greater network competition nationwide. The proposed T-Mobile-Sprint merger jeopardize network competition especially on a nationwide level because in the United States there are no wireless providers that deliver particularly native network coverage on a nationwide level other than AT&T Mobility, Verizon Wireless, T-Mobile and Sprint which are only 4 nationwide providers which make them major providers in the country. If the T-Mobile-Sprint merger were to be allowed, the network competition would be substantially reduced on a nationwide level because there are once again only 4 wireless providers in the United States that deliver their own network service from their own wireless network. Another very important thing to note is price competition in turn are caused by network competition because the network is what delivers the service to consumers. Therefore, T-Mobile’s and Sprint’s claim that this is not the case where the number of wireless competitors would be reduced from 4 to 3 are completely not true. The CEO John Legere of T-Mobile stated this before: “This isn’t a case of going from 4 to 3 wireless companies – there are now at least 7 or 8 big competitors in this converging market. And in 5G, we’ll go from 0 to 1. Only the New T-Mobile will have the capacity to deliver real, nationwide 5G,” added Legere. “We’re confident that, once regulators see the compelling benefits, they’ll agree this is the right move at the right time for consumers and the country.” What T-Mobile and Sprint both claim is that the number of wireless providers increased such as Comcast and charter and that they are some of the existing competitors in the wireless industry. However, both T-Mobile and Sprint ignore the fact that these providers are “MOBILE NETWORK VIRTUAL OPERATORS” or “MVNO” for short, NATIONWIDE and that T-Mobile, Sprint, AT&T, and Verizon Wireless are the only 4 remaining “MOBILE NETWORK OPERATORS” NATIONWIDE. What is the difference between an MNO and an MVNO. Fundamentally, an MNO provides its own network service to its customers using its own network infrastructure and spectrum and resources, and etc. And an MVNO provide network service to its customers using the network of an MNO by leasing and renting the right to do so, which means the MVNO providers pay the MNO providers for the right to use their wireless network in order to deliver wireless service to its customers. However, what happens when the number of MNO providers reduces especially on a nationwide level from 4 MNO providers to 3 MNO providers. The MNO wireless providers have the incentive to increase the prices to the MVNO wireless providers because the MNO wireless providers know that there are less MNO providers competing head to head on a nationwide level and in turn the MVNO providers will be basically forced to increase the prices to its wireless customers and the MNO wireless providers knowing that there are less MNO providers especially on a nationwide scale will increase the prices to their wireless customers. In other words MNO wireless providers will increase the prices for its wireless customers knowing there are less competition among MNO wireless providers especially on a nationwide scale and for the MVNO wireless providers also knowing that these MVNO wireless providers depend on them to provide wireless service to its customers. So, how do wireless consumers win? Wireless consumers do not win either way and they do not even win in the provision of better wireless service because the capacity of wireless spectrum per consumer will not increase and that is because T-Mobile would acquire the customers of Sprint.

The bottom line here is wireless carriers need more and more spectrum reduce network congestion as the consumer demand for wireless data keeps growing fast overtime and consumers need more competition among wireless MNO providers especially on a nationwide scale as better services, more innovation, higher quality, more choices, and the like are extremely important for wireless consumers, our economy, prices, and etc. More and more wireless spectrum is also important for 5G in the future so that wireless providers would have greater simplicity to wireless consumers. Essentially price competition is dependent on network competition. This can be compared to one manufacturer having a monopoly or limited competition and a retailer facing more competition and because the manufacturer has no competition or limited competition, that manufacturer does not have enough incentive to charge the retailers great prices because of the lack of competition on manufacturing certain products and the retailers would be basically forced to charge their customers higher prices and consumers as a result do not feel the benefits of competition. After the FCC and the Department of Justice blocked the merger between AT&T and T-Mobile, the results were very beneficial for consumers, competition and the economy. Both T-Mobile and Sprint claim that the merger between them will create greater competition, lower prices, more job growth, more value, and etc. Many historic mergers have done the opposite because providers have substantially reduced incentive to offer the benefits to consumers. Look at what happened after the merger between AT&T and Time Warner, AT&T increased the price after the Department of Justice unfortunately failed to block the merger between them and this was a horizontal merger. The bottom line is wireless carriers should have more wireless spectrum to enable them to provide better wireless services to consumers because spectrum is basically the lifeblood of the provision of wireless services and capacity necessary to keep up with the growth of wireless data usage by consumers. Another thing to note is that T-Mobile uses the GSM network while Sprint uses the CDMA network which means if the merger to be allowed, consumers will be forced to eventually purchase new phones as T-Mobile would integrate the Sprint network into T-Mobile’s network. T-Mobile and Sprint have been a very important source historically competing on network including but not limited to network coverage, network reliability, network speeds, network capacity, network performance, network responsiveness, and other network related things. In 2010 and beyond, wireless providers have wireless providers have been eliminating unlimited data plans to new consumers due to network congestion. For example AT&T eliminated unlimited data back in 2010 and Verizon eliminated unlimited data back in 2011 and T-Mobile eliminated unlimited data in 2011 as well, however T-Mobile did not impose overage fees at least for exceeding one’s data limit. Sprint continued to offer unlimited data. In 2012 T-Mobile formed a new team and a new CEO, and in 2013 onwards T-Mobile has been very disrupting the wireless industry with a campaign, which the CEO named the “Un-carrier”. This campaign was meant to do things that carriers would normally not do. In March 2013, T-Mobile eliminated annual service contracts to consumers and introduced a simplified rate plan called the Simple Choice Plan and introduced a financing plan to replace annual service contracts called the Equipment Installment Plan or EIP for short and all of this was Un-carrier 1.0. Un-carrier 2.0 introduced a program called **JUMP** which allowed early upgrades up to twice a year back at the time which was in July 2013. In October 2013, T-Mobile introduced Un-carrier 3.0, which allowed consumers to use their cell phones abroad in over 100 select countries with unlimited data at 2G speeds typically, unlimited text and calling for only 20 cents per minute and recently T-Mobile expanded the list of countries included to more than 200 countries. In January 2014 introduced Un-carrier 4.0, which back at the time was known as “Contract Freedom” and this provided the benefit to consumers of paying off their Early Termination Fees, which typically amounted to over $300 per person. Consumers saved a lot of money with this offer and later T-Mobile expanded this offer by providing funds to pay off the consumers’ remaining financing installments and to payoff the remaining amount consumers owed their current wireless carrier for leasing a device. This is one of the huge benefits consumers received thanks to such competition. In June 2014, T-Mobile introduced Un-carrier 5.0 and Un-carrier 6.0. Un-carrier 5.0 offered consumers to test-drive T-Mobile’s network for 7 days before actually staying as a T-Mobile customer and Un-carrier 6.0 offered unlimited music that did not count against the data bucket in the Simple Choice Plan. Un-carrier 7.0 offered a Personal Cellspot, which included Wi-Fi, is one’s household or office and later that offer was expanded to include a 4G LTE cellspot, thus expanding cellular coverage indoors. Un-carrier 8.0 was introduced on December 16, 2014, which offered “Data Stash” to Simple Choice Plan customers, which allowed customers to rollover their unused data from month-to-month up to 12 months without losing the unused data, and have a good opportunity to use all the data that consumers paid for. Un-carrier 9.0 was introduced on March 17, 2015 which simplified the Simple Choice Plan for business customers and alongside offered the “Un-contract” to consumers which would guarantee the price not to go up for as long as the consumer would hold on to that rate plan. Un-carrier 10.0, which is known as “Un-carrier X”, introduced a unlimited video known as Binge On which allowed consumers to watch optimized video content without it counting against the consumer’s data bucket which was introduced November 9th, 2015. On June 6th, 2016, T-Mobile introduced Un-carrier 11.0, which is a gratitude program and thanks customers for being a customer every Tuesday by getting free stuff, and discounted items every Tuesday via the T-Mobile app. On August 18th, 2016, T-Mobile introduced Un-carrier 12.0, which offers a consumer plan called “T-Mobile ONE”. T-Mobile ONE replaces rate plans with data buckets and offers unlimited talk, text and high-speed data nationwide. On July 8th, 2015, T-Mobile introduced a benefit called “Mobile Without Borders” which allowed consumers to use their devices in Mexico and Canada the same way like in the United States matching what rate plan allows. On November 12th, 2017, T-Mobile put a restriction on “Mobile Without Borders” by placing a 5GB limit on data usage in Canada and Mexico unless the consumer rate plan had less than 5GB. T-Mobile ONE which was introduced as part of Un-carrier 12.0 offered unlimited 4G LTE hotspot if the consumer agreed to upgrade its consumer plan for an extra monthly cost. On August 6, 2018, T-Mobile replaced Unlimited 4G LTE hotspot with 20GB of 4G LTE hotspot to new consumers. On January 4th, 2017, T-Mobile introduced “Un-carrier NEXT” which offers T-Mobile ONE with taxes and fees included. On September 5th, 2017, T-Mobile introduced another Un-carrier NEXT move called “Netflix On Us” which offered consumers to pay for their Netflix monthly subscription. On December 13th, 2017, T-Mobile introduced an Un-carrier move for TV to provide channels via software after acquiring Layer TV. On August 6th, 2018, T-Mobile introduced a “T-Mobile Essentials” rate plan where consumers pay for unlimited talk, text, and high-speed data and only select features offered by T-Mobile ONE. After advertising T-Mobile ONE with taxes and fees included and shouting how wrong it is not to include taxes and fees, T-Mobile overtime decided to introduce a rate plan with taxes and fees excluded called “T-Mobile Essentials. There could be more consumer benefits that I did not mention. As you can see that no merger history that we know of has led to such beneficial results for consumers. Consumers did not expect for the wireless industry to change so much since the merger between AT&T and T-Mobile was successfully blocked back in 2011. All of these things and much more are the reasons why we need more competition and not less. No conditions or divestiture or divestment or anything like that will compensate the lack of competition this proposed merger between Sprint and T-Mobile would produce. At the end of the day this is about wireless network and wireless spectrum. So instead of approving mergers and acquisitions that threaten to substantially reduce competition, the FCC should instead unleash more and more wireless spectrum including but not limited to Low-Band Spectrum, Mid-Band Spectrum, High-Band Spectrum. This is the best way to promote competition. Please do not allow the convincing stories of the merging parties to make the FCC ignore the fundamental things about how harmful this merger is. If there are any questions please call me at my phone number 718-715-9355 or please email me at [LX\_YUSUPOV@YAHOO.COM](mailto:LX_YUSUPOV@YAHOO.COM). Thank you and have a nice day.