

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Applications of T-Mobile US, Inc.	)	
	)	WT Docket No. 18-197
and	)	
	)	
Sprint Corporation	)	
	)	
Consolidated Applications for Consent To	)	
Transfer Control of Licenses and Authorizations	)	

**BRIEF COMMENTS OF THE DIGITAL POLICY INSTITUTE AND SUBMISSION OF  
A RESEARCH STUDY BY THE PHOENIX CENTER FOR ADVANCED LEGAL &  
ECONOMIC PUBLIC POLICY STUDIES**

On July 18, 2018, the Federal Communications Commission (“FCC”) issued a *Public Notice*<sup>1</sup> in the above-captioned proceeding. The *Public Notice* established a pleading cycle for those parties interested in submitting petitions to deny, informal comments or other related documents related to the request of T-Mobile US, Inc. (“T-Mobile”) and Sprint Corporation (“Sprint”) for FCC consent to the transfer of control of Sprint licenses, authorizations and spectrum leases to T-Mobile.

Here the Digital Policy Institute (“DPI”)<sup>2</sup> submits brief comments in response to the Commission’s *Public Notice*. DPI believes that, as the Commission evaluates its legal, policy

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<sup>1</sup> DA 18-740, in WT Docket No. 18-197.

<sup>2</sup> DPI is an independent digital communications research and policy organization established in 2004.

and regulatory options here – and makes its ultimate public interest judgment – it is essential that the agency take steps that are based on sound economic theory and analysis.

In this regard we point to a new research study – released today – by the Phoenix Center for Advanced Legal & Economic Public Policy Studies. That report, authored by Phoenix Center Chief Economist Dr. George S. Ford, is titled *Potential Implications of the Sprint/T-Mobile Merger on Wholesale Markets*. This study suggests that the reviewing authorities evaluate whether a grant of the T-Mobile/Sprint request could result in an increase in prices for mobile wireless services in geographic areas where Sprint and T-Mobile are active sellers. A copy of this research study is submitted with these brief DPI comments.

DPI appreciates the opportunity to enter the Phoenix Center’s research into the record of these proceedings.

Respectfully submitted,

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