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 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”) 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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1 DA 18-740, in WT Docket No. 18-197.
2 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,

/s/ Barry D. Umansky
Barry D. Umansky
Senior Fellow and Senior Policy Advisor
Digital Policy Institute
Muncie, Indiana 47306
(765) 717-4928

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