

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

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

COMMENTS OF ULTRA MOBILE AND MINT MOBILE

Ultra Mobile (“Ultra”) and Mint Mobile (“Mint”) submit these comments in support of the transaction between Sprint Corporation and T-Mobile US, Inc. As a mobile virtual network operator (“MVNO”), Ultra and Mint rely upon the facilities-based wireless carriers’ spare capacity to offer high-quality wireless broadband service to consumers at affordable prices. The combination of Sprint and T-Mobile will bring innovation to the market and allow independent resellers like us to better compete through differentiated services and price. For Ultra, Mint, consumers, and other MVNOs, the proposed merger will help create networks with better coverage, more capacity, greater throughput, and lower latency than would otherwise be available. In addition to better wireless networks, the merger of Sprint and T-Mobile will drive down prices, reducing wireless connectivity costs for both the MVNOs and U.S. consumers they serve.

Currently, there are many different options available to consumers. The most inclusive postpaid wireless plan is a \$160/month unlimited plan for a family of four.¹ For \$40 per person on T-Mobile, each receives unlimited talk, text, and data, free Netflix (or free Hulu from Sprint), free international roaming, and free Wi-Fi on airplanes. For \$35 per month, consumers can stick with T-Mobile’s or Sprint’s network through their own prepaid brand on MetroPCS (T-Mobile)²

¹ T-Mobile, *Cell Phone Plans* (last visited Aug. 17, 2018), <https://www.t-mobile.com/cell-phone-plans>.

² MetroPCS, *No Contract Phone Plans* (last visited Aug. 17, 2018), <https://www.metropcs.com/shop/plans>.

or Boost Mobile (Sprint).³ \$35 still buys unlimited talk, text, and data, but additional services and benefits like Netflix, Hulu, and roaming are not included.

By reselling the excess network capacity of T-Mobile and others, the true price leaders are Ultra, Mint, and other MVNOs. These resellers offer the most competitive rates in wireless, with some offering unlimited plans for as little as \$15 per month.⁴

The proposed transaction of Sprint and T-Mobile is the opportunity for regulators to create more intense competition in the wireless market, to the benefit of MVNOs and consumers alike. Neither T-Mobile nor Sprint can compete as effectively as standalone companies as New T-Mobile could, and their 5G networks would not have the nearly the same coverage, throughput, capacity, or latency without the combination. By merging, committing to create a network that is nearly ubiquitous, and filling in the voids that the present 4G LTE network has, the combined company will drive down prices that consumers will pay and dramatically increase the quality and speed of wireless connectivity that consumers pay for.

If the merger does not happen, T-Mobile and Sprint will likely spend about \$10 billion, each, to build moderately better networks in the next five years. Combined, they have planned to build one extremely powerful network, invest nearly \$40 billion over the next three years, and create tens of thousands of jobs here in United States

While moving from four networks down to three would appear to result in less choice and higher prices, Mint and Ultra anticipate that the opposite is actually the case. Neither Sprint nor T-Mobile is able to compete directly with AT&T and Verizon. New T-Mobile, on the other hand, would have the spectrum, infrastructure, and financial resources to build the network that is capable of aggressively competing with AT&T and Verizon. This aggressive competition will

³ Boost Mobile, *Monthly Cell Phone Plans* (last visited Aug. 17, 2018), <https://www.boostmobile.com/plans>.

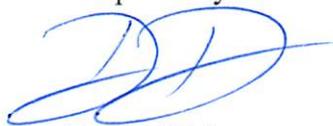
⁴ See, e.g., Mint Mobile, *Choose Your Plan* (last visited Aug. 17, 2018), <https://www.mintmobile.com/plans/>.

encourage further investment among each of the three carriers, creating strong incentives to compete both on price and quality.

These network improvements will create new competition in the fixed broadband market, which will force incumbents to contend with 5G wireless broadband speeds that are much faster than today's average landline or cable internet. Currently, nearly half of all American homes have none or only one provider offering them wired broadband at home at speeds of 25 Mbps.⁵ T-Mobile has said it intends to offer wireless broadband coverage to more than 90% of the country by 2024, which will finally bring much-needed competition to the cable providers.⁶

Having three world-class wireless networks will accelerate America towards the 5G leadership position, giving consumers faster and better wireless networks than nearly every other country. With all of the excess wireless capacity created by tomorrow's 5G networks, MVNOs will continue be able to bring cost-conscious customers high-quality services at the lowest rates possible.

Respectfully submitted,



David Glickman
CEO
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August 28, 2018]

⁵ Jon Brodtkin, *50 Million US Homes Have Only One 25Mbps Internet Provider or None at All*, ARS TECHNICA (June 30, 2017), <https://bit.ly/2sZ70ms>.

⁶ Description of Transaction, Public Interest Statement, and Related Demonstrations, T-Mobile US, Inc. and Sprint Corporation, WT Docket No. 18-197, at 27-28 (file June 18, 2018).