

**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 TALK MORE WIRELESS**

Talk More Wireless (“Talk More”) submits these comments in support the proposed merger between Sprint and T-Mobile. The combination of T-Mobile and Sprint will allow us to offer wireless services with faster speeds and better coverage, which will improve Talk More’s competitive posture and open new opportunities for rapid expansion. The 2013 merger between T-Mobile and MetroPCS was a major boon that led to explosive growth in the number of locations operated and employees hired by Talk More. Talk More expects to substantially grow and hire more employees as a result of the merger between Sprint and T-Mobile.

**I. BACKGROUND**

Talk More is a mid-sized company that focuses on providing high-quality wireless devices and services to cost-conscious consumers and is the fastest-growing Authorized Dealer of MetroPCS, a subsidiary of T-Mobile. When Talk More was founded in 2002, it operated 12 MetroPCS stores and had only a few dozen employees. Talk More’s growth was relatively modest until T-Mobile acquired MetroPCS.

Naysayers of the T-Mobile's acquisition of MetroPCS argued that "consolidation" would lead to job losses<sup>1</sup> and store closures,<sup>2</sup> but in only four years, the MetroPCS prepaid brand nearly doubled its subscriber count from nine million to almost eighteen million.<sup>3</sup> The explosive subscriber growth drove retail expansion and hiring. T-Mobile opened nearly 1,500 stores and more than 1,300 MetroPCS stores in 2017 alone.<sup>4</sup> Since the merger of T-Mobile and MetroPCS, the combined company added about eleven thousand employees—more than a twenty-five percent increase in workforce size.<sup>5</sup>

## II. DISCUSSION

Talk More benefited directly from T-Mobile's investments in the MetroPCS brand, distribution chain and customer-service model. T-Mobile's acquisition of MetroPCS opened strategic growth opportunities that allowed what was then a small business to expand into new markets. From a modest start with just 12 stores and a few dozen employees, Talk More now operates more than 170 stores and employ nearly 900 people across sixteen states.

We expect T-Mobile will apply the same winning formula of investment, innovation and growth following the proposed merger with Sprint. Together, T-Mobile and Sprint will have the

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<sup>1</sup> Press Release, *T-Mobile-MetroPCS Deal Will Result in Significant Job Cuts, FCC Must Give Transaction Full Scrutiny*, COMMUNICATIONS WORKERS OF AMERICA (Mar. 11, 2013), <https://bit.ly/2KYNSLO>.

<sup>2</sup> Press Release, *Greenlining Institute Asks FCC to Deny T-Mobile/MetroPCS Deal*, THE GREENLINING INSTITUTE (Mar. 12, 2013), <https://bit.ly/2KFiktO>.

<sup>3</sup> Aaron Pressman, *How T-Mobile Turned a Tough Merger into an Industry Success*, FORTUNE (May 5, 2017), <https://for.tn/2v1vPBx>.

<sup>4</sup> Adam Levy, *New Stores Are a Key to T-Mobile's Growth*, MOTLEY FOOL (Mar. 6, 2018), <https://bit.ly/2twv81Y>.

<sup>5</sup> *Compare* T-Mobile US, Inc., Annual Report (Form 10-K) at 6 (Feb. 25, 2014) *with* T-Mobile US, Inc., Annual Report (Form 10-K) at 8 (Feb. 8, 2018).

capital, infrastructure, and spectrum needed to build a wireless network with broader coverage, faster speeds, and greater capacity than either company could achieve separately.

Mid-sized businesses like Talk More stand to gain from these improvements every bit as much as consumers. Talk More intends to triple the number of stores it operates within eighteen months of when the merger of T-Mobile and Sprint closes. The planned three-fold expansion in retail stores will require hiring many more employees so to provide the high-quality customer service that customers have come to expect from the Talk More brand.

The merger of T-Mobile and Sprint will create a world-class 5G network that can deliver wireless broadband connectivity at speeds previously only seen with fiber. Talk More has seen and benefitted directly from the fast-paced investment and integration from T-Mobile in the past. Talk More expects the same type of economic expansion in the future following approval of the proposed transaction.

### III. CONCLUSION

Talk More wholly supports the merger between Sprint and T-Mobile and encourages timely review and approval of the proposed transaction. Doing so will allow Talk More to create new growth opportunities and provide even higher quality services to Talk More customers.

Respectfully submitted,



/s/ Jimmy Ralph

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CEO & Founder  
Talk More Wireless

[August 28, 2018]