August 29, 2018

**VIA ELECTRONIC FILING**

Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, DC 20554

**Re: *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 18-197**

Dear Ms. Dortch,

This letter is to express Crown Castle International Corp.’s (“Crown Castle”)[[1]](#footnote-1) support for Sprint and T-Mobile’s planned merger.[[2]](#footnote-2) The combination of these two smaller nationwide wireless providers will advance the national priority of fast-tracking 5G deployment and create a company with the spectrum and other necessary resources to help the U.S. win the global race for 5G leadership. We anticipate that, in addition to consumers and enterprise consumers, Crown Castle and other companies throughout the mobile wireless supply chain can benefit from New T-Mobile’s investment in its next-generation wireless network.

Crown Castle is at the forefront of our country’s broadband revolution, deploying fiber optic and wireless infrastructure and developing the small cell networks that will serve as the backbone for the broadband networks of the future. With more than 40,000 towers, approximately 60,000 small cells constructed or under contract, and over 60,000 miles of fiber, Crown Castle is the country’s largest owner and operator of shared wireless infrastructure. Crown Castle provides, among a host of other service offerings, wholesale wireline transport services to wireless carrier customers. Our fiber networks provide the necessary carriage of signals to and from radios used by the wireless carrier customers in a manner often referred to as “wireless backhaul.” This service offering is a key component to every small cell deployment, and thus Crown Castle and other network providers like it are a critical piece of this country’s broadband ecosystem, supporting the deployment of next-generation wireless services.

As described in the companies’ Public Interest Statement, New T-Mobile intends to invest nearly $40 billion to deploy next-generation wireless broadband technology.[[3]](#footnote-3) T-Mobile and Sprint have said they intend to densify the combined network using a cell-splitting plan anchored on the T-Mobile cell site network.[[4]](#footnote-4) The companies have also said they will deploy both parties’ spectrum across the combined network, “ultimately leading to far more 5G sites being deployed than either standalone company had planned or could practicably deploy.”[[5]](#footnote-5)

As further described in the Public Interest Statement, the merger of T-Mobile and Sprint promises to stimulate business growth and create thousands of American jobs.[[6]](#footnote-6) The new network investment has the potential to create durable economic employment gains in the infrastructure segment that Crown Castle serves. The post-combination business plan of New T-Mobile will likely also result in substantially more investment than the companies would have made on a standalone basis. Capturing our fair share of that business promises new revenue opportunities for our business that, if fully realized, would likely require us to expand employment levels to satisfy demand.

The potential business and employment gains for infrastructure providers do not end with New T-Mobile. Competing service providers may also desire to increase their network investments to offer enhanced service as a result of the merger.[[7]](#footnote-7) Increased network investment by New T-Mobile could stimulate rival carriers to invest more resources in base stations and point-to-point connections, which, in turn, could potentially create a virtuous circle of investment and innovation that stands to benefit not only Crown Castle and its employees, but also the economy as a whole.

The lynchpin of this virtuous circle is the merger of T-Mobile and Sprint. The companies have told us — and their investors — that they cannot deploy robust 5G networks on their own. “On a standalone basis,” the parties have said, “T-Mobile would be capacity constrained and Sprint lacks coverage.”[[8]](#footnote-8) Sprint has added that it faces financial challenges that pose serious impediments to sustained network investment.[[9]](#footnote-9)

To realize the economic opportunity that New T-Mobile promises to create and expedite the commercial availability of 5G network connectivity in the U.S., Crown Castle encourages the FCC to grant Sprint and T-Mobile’s applications and allow the companies to merge.

Please feel free to contact me with any questions. I am filing a copy of this letter in the above-referenced docket, consistent with section 1.1206 of the Commission’s rules.

Respectfully submitted,

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|  | */s/ Jay A. Brown*  Jay A. Brown  President and Chief Executive Officer  Crown Castle International Corp. |

cc: (via email)

Chairman Ajit Pai

Commissioner Michael O’Rielly

Commissioner Brendan Carr

Commissioner Jessica Rosenworcel

1. Crown Castle, a U.S.-based company founded in 1994 and headquartered in Houston, Texas, employs more than 4,500 people across the U.S. in its more than 100 offices. We are an S&P 500 company publicly traded on the New York Stock Exchange, with a market capitalization of over $46 billion. [↑](#footnote-ref-1)
2. *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations*, Public Interest Statement, WT Docket No. 18-197 (filed June 18, 2018) (“Public Interest Statement”). [↑](#footnote-ref-2)
3. Public Interest Statement at 15. [↑](#footnote-ref-3)
4. *Id.* at 29-30. [↑](#footnote-ref-4)
5. *Id.* [↑](#footnote-ref-5)
6. *Id.* at 80-81. [↑](#footnote-ref-6)
7. *Id.* at 47-50. [↑](#footnote-ref-7)
8. *Id.* at 19. [↑](#footnote-ref-8)
9. *Id.* at 94-98. [↑](#footnote-ref-9)