

**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 TILLMAN INFRASTRUCTURE**

Tillman Infrastructure is a growing American business that owns and operates wireless infrastructure. Tillman and its affiliates invest in and manage telecommunications towers, small cells, and smart city businesses. Tillman focuses on both developed and emerging markets. Tillman owns and operates hundreds of macro sites across the country.

Tillman Infrastructure supports the proposed merger of T-Mobile and Sprint because it will create a nationwide mobile broadband operator with the scale and financial resources to invest in tower and wireless infrastructure more than either standalone company could. More investment in American infrastructure promises to grow U.S. jobs, stimulate economic growth, and deliver faster mobile broadband to urban, suburban, and rural consumers.

The construction of next-generation mobile broadband networks, commonly known as “5G,” should be a transformative event for consumers, with positive effects across the entire tower and wireless infrastructure industry. Next-generation 5G networks will require an increase in spectrum deployment, which, in turn, will require more towers and cell sites. Mobile broadband operators will construct more macro-cell towers for their low- and mid- frequency spectrum to provide consumers with a ubiquitous base-layer of coverage, the ability to carry large amounts of data, and low enough latency to support critical applications.

For Tillman, the expansive, high-capacity 5G network that the newly merged entity should deploy creates the opportunity to build not only more base-station infrastructure, but also better base-station infrastructure that is more cost effective and more responsive to the market. In addition, the new 5G radio-access network will require infrastructure companies to offer new base station configurations that can respond to the changing capabilities of the next-generation radio access network. Carriers will work with infrastructure providers who can deploy solutions that take full advantage of the dynamic interplay between the 5G radio standard and the many new use cases that the standard will support – from home broadband replacement, to the Internet of Things and fueling new applications in the automotive, healthcare, and manufacturing sectors.

Deploying next-generation mobile broadband deployment represents a cost-intensive effort that requires extensive investments in towers, fiber, spectrum, and backhaul. We believe the combination of T-Mobile and Sprint will help provide the combined company with the ability to overcome sizeable upfront costs associated with building widespread, high-capacity next-generation broadband networks. The combined resources should provide the incentive and ability to invest more heavily in rural America and throughout the country. And with greater investment in towers and other wireless infrastructure, consumers will see the benefits of faster and deeper coverage as at least three well-capitalized nationwide carriers push 5G deeper into underserved pockets of the country.

Tillman believes that the union of T-Mobile and Sprint will support more U.S. infrastructure, increase employment, and accelerate next-generation broadband deployment. We encourage the Commission to approve the merger.

Respectfully submitted,

**TILLMAN INFRASTRUCTURE**

/s/ William Hague

William Hague  
President and CEO  
Tillman Infrastructure

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