Re: Notice of Ex Parte, 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:

Brian Hendricks and Jeffrey Marks, of Nokia, met with the following Commissioners’ offices in separate meetings:

- On August 28, 2018, (1) Commissioner Michael O’Rielly and his Legal Advisor, Erin McGrath; and (2) Commissioner Jessica Rosenworcel and her Interim Legal Advisor, Elizabeth McIntyre;
- On August 29, 2018, Will Adams, Legal Advisor to Commissioner Brendan Carr (by telephone with Mr. Marks only);
- On August 30, 2018, Michael Carowitz, Special Counsel to Chairman Ajit Pai (with Mr. Marks in person and Mr. Hendricks by telephone).

The Nokia representatives covered a range of issues, largely related to the “Race to 5G,” in each meeting that are reflected in a separate ex parte submission in the relevant dockets, but also offered comments on several claims made on the record in this docket regarding the benefits of a T-Mobile and Sprint Merger.

Specifically, while discussing the “Race to 5G” and the position of the U.S. in staying competitive with other countries, including China, South Korea, and Japan, Nokia confirmed the synergies and benefits that would be achieved through a combination of Sprint’s and T-Mobile’s spectrum holdings and network infrastructure. We noted that Sprint has a strong spectrum portfolio, but a relative lack of low-band spectrum, meaning it will have a more difficult path to deploying 5G into more rural geographies. Combined with significant debt, a standalone path to a nationwide 5G for Sprint would have significant challenges.
T-Mobile has demonstrated a commitment to early 5G deployment, and Nokia is pleased to be a leading vendor in these early plans for 5G build-out. However, Nokia agrees that the addition of the Sprint spectrum assets, notably in the mid-band 2.5 GHz range, will provide T-Mobile with the additional capacity and deployed sites to allow the proposed “New T-Mobile” to accelerate its 5G deployment timetable and to offer a more fulsome, capable, and rapid 5G deployment than it could without the addition of the Sprint assets. A deployment based on the combination of the spectrum assets and infrastructure of the two companies would result in 5G capabilities to consumers nationwide that are more robust than those that could reasonably occur if the companies’ assets remain separate.

For these reasons, we agree with the assertion that a combination of T-Mobile and Sprint would result in a far greater ability to roll-out and fully evolve 5G services to all Americans. Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

/s/ Brian Hendricks

Brian Hendricks
Head of Policy and Public Affairs
Americas Region

Jeffrey Marks
Head of Regulatory Affairs
North America

cc: Commissioner Michael O’Rielly
Erin McGrath, Legal Advisor to Commissioner O’Rielly
Commissioner Jessica Rosenworcel
Elizabeth McIntyre, Interim Legal Advisor to Commissioner Rosenworcel
Will Adams, Legal Advisor to Commissioner Brendan Carr
Michael Carowitz, Special Counsel to Chairman Ajit Pai