

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

COMMENTS OF THE NATIONAL HISPANIC COUNCIL ON AGING

The National Hispanic Council on Aging (“NHCOA”) writes in support of the merger of T-Mobile and Sprint¹ because it will improve mobile broadband access and thereby improve the quality of life for the Hispanic/Latino elderly, their families, and their communities.

I. INTRODUCTION

NHCOA is the leading national organization working to improve the lives of Hispanic older adults, their families and their caregivers. Headquartered in Washington, DC, NHCOA has been a strong voice dedicated to promoting, educating, and advocating for research, policy, and practice in the areas of economic security, health, and housing for more than 30 years. In 2014, there were 3.6 million elderly adult Hispanics, constituting 8% of the elderly population in the United States; this number is expected to grow to 21.5 million by 2060. In light of the rapid growth of the Latino aging population, NHCOA also empowers Hispanic older adults and families by offering leadership development opportunities and trainings to enable them to age with dignity and become their own best advocates. To achieve its mission, NHCOA has developed a Hispanic Aging Network of community-based organizations across the continental

¹ *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”).

U.S. and Puerto Rico that serves millions of Latinos each year. NHCOA also works to ensure that the Hispanic community is better understood by U.S. policymakers and is fairly represented in their decisions and policies. By encouraging a multicultural dialogue, NHCOA believes in building a stronger America in which we can all age securely, with dignity and greater self-sufficiency, and in the best possible health.

Access to mobile broadband is key to achieving many of NHCOA's goals for aging Hispanics. By expanding mobile broadband coverage, increasing the capacity of its network to support next-generation health and communications applications, and decreasing the cost of access, New T-Mobile's nation-leading 5G network will significantly improve the lives of NHCOA's constituents.

II. NHCOA'S COMMUNITIES HAVE A PRONOUNCED NEED FOR AFFORDABLE, HIGH-SPEED, MOBILE BROADBAND

High-speed broadband is a vital and efficient way to deliver information, services, and products, particularly to aging communities; it is a platform that transforms the way the aging community stays connected and receives health care. Elderly adults who have access to broadband have more tools at their disposal to help them live life to the fullest irrespective of physical ability or geographic location. Mobile broadband access can mean the difference between getting financial notices, health status updates, and staying in touch with far-flung family members, or missing those all-important contacts.

The Hispanic community increasingly relies solely on a mobile broadband connection for access to the Internet. One in five U.S. adults is a "smartphone only" Internet user, and this trend is particularly pronounced among Hispanics: 35% of Hispanics do not have broadband at home and depend on their smartphones for Internet access compared to 24% of Black consumers, and

14% of White consumers.² Therefore it is crucial that elderly Hispanics have sufficient access to mobile broadband services.

Mobile broadband is also important to NHCOA's communities because it will support the next-generation health care services that will benefit elderly Hispanics. Today, wireless networks are already helping to optimize health care outcomes for seniors through reliable and real-time remote access to health care professionals. Internet of Things applications are already improving preventative care and early identification and detection of illnesses, enabling doctors to treat homebound patients, and reducing the need for in-person follow-up appointments.³

The arrival of 5G networks will spur further advances in health care for elderly people across the country. For example, 5G connectivity will give less mobile elderly patients access to telehealth and telemedicine by connecting them with specialists and experienced professionals across the country.⁴ This reduces the need to transfer sick patients, not only lowering costs, but improving the quality of care.⁵ For those suffering from chronic illnesses like diabetes, cardiovascular disease, or cancer, remote monitoring is essential. Devices like clinical wearables and remote sensors will track vital signs, glucose levels, and physical activity, and transmit that data to the patient's health care provider.⁶ The low latency of 5G networks is also expected to

² See *Mobile Fact Sheet*, PEW RESEARCH CENTER: INTERNET & TECHNOLOGY (Feb. 5, 2018), <http://www.pewinternet.org/fact-sheet/mobile/>.

³ *Wireless Connectivity Fuels Industry Growth and Innovation in Energy, Health, Public Safety, and Transportation*, DELOITTE (Jan. 2017), https://api.ctia.org/docs/default-source/default-document-library/deloitte_2017011987f8479664c467a6bc70ff0000ed09a9.pdf.

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

support remote surgery applications, enabling surgeons to operate on patients across the country, facilitating access to specialists who may not otherwise be available. 5G connectivity will further empower patient choice, encourage patients to see a health care professional sooner, and provide new functionality for the health care industry. Analysts project that 5G health care applications could generate \$305 billion in health care cost savings every year,⁷ which would particularly benefit low-income, elderly Hispanics.

In order to meaningfully help NHCOA's community, access to mobile broadband must be affordable. Our analysis indicates the poverty rate among Hispanic seniors currently stands at 17.9% of the total population of Hispanic senior citizens.⁸ Economic insecurity is especially difficult for older adults who are often not physically able to improve their economic situation by re-entering the workforce. Most of the elderly experiencing economic insecurity spent their youth and adulthood in the workforce, but were not able to save enough money to support their basic needs in older age. This is because many service sector and labor jobs held by Hispanics are low-wage and low-benefits, and many employers do not contribute to retirement funds, making saving for retirement difficult or impossible.

Hispanics are also still feeling the effects of the economic downturn even a decade later. The financial crisis wiped out wealth accumulated in Hispanic households, including property value, and made even low-wage and low-benefits jobs scarce. According to the Pew Hispanic

⁷ *See id.*

⁸ *See Economic Security*, NHCOA, <http://www.nhcoa.org/our-focus/economic-security/> (last visited Aug. 21, 2018).

Center, Hispanic household wealth fell 66% between 2005 and 2009.⁹ Moreover, the economic downturn, combined with high national debt, and current political agendas has resulted in a push to put cut Federal programs, including Social Security. Hispanic older adults are more likely to be wholly dependent on Social Security than any other racial or ethnic group. Without Social Security, a full 50% of Hispanic older adults would be living in poverty.¹⁰

Together, these factors make access to high-speed, affordable, mobile broadband absolutely crucial for the elderly Hispanics NHCOA represents. The transaction between T-Mobile and Sprint will marry two providers with reliable and complementary wireless networks, enabling the merged company to deploy a 5G network that serves the needs of NHCOA's communities better than either company could standing alone, or other leading carriers can today.

III. NEW T-MOBILE HAS A GREATER INCENTIVE AND ABILITY TO IMPROVE AND EXPAND MOBILE BROADBAND COVERAGE AND DECREASE PRICES THAN VERIZON, AT&T, OR EITHER COMPANY STANDING ALONE

NHCOA is confident that New T-Mobile will have the incentives, network assets, and scale to expand its coverage and decrease costs for consumers to deliver a 5G network that is better and more affordable than the standalone companies, Verizon, or AT&T could deploy today. New T-Mobile will be able to leverage the unique combination of T-Mobile's and Sprint's assets to deliver unprecedented levels of coverage and service to consumers, and do so faster than otherwise possible.

⁹ Rakesh Kochhar et al., *Hispanic Household Wealth Fell By 66% from 2005 to 2009*, Pew Research Center: Hispanic Trends (July 26, 2011), <http://www.pewhispanic.org/2011/07/26/the-toll-of-the-great-recession/>.

¹⁰ See *Economic Security*, NHCOA, <http://www.nhcoa.org/our-focus/economic-security/> (last visited Aug. 21, 2018).

Standing alone, T-Mobile and Sprint both face challenges in moving toward a 5G future, toe-to-toe with Verizon and AT&T. T-Mobile’s network is built upon strong coverage spectrum, but the capacity of its network is limited. Sprint’s network has strong capacity, but its coverage is limited. Together, Net T-Mobile will combine Sprint’s 2.5 GHz high-capacity spectrum with T-Mobile’s 600 MHz low-band, broad coverage spectrum to deliver an unrivaled mobile 5G platform. According to the applicants, the network will have more capacity than any network in history—more than three times the available capacity of the networks standalone T-Mobile or Sprint could deploy by 2024.¹¹ The combined company’s network will also provide the high speeds and low-latency connectivity necessary to support the many innovative applications, particularly enhanced capabilities in health care, which will accompany the arrival of 5G and benefit elderly Hispanics.

And New T-Mobile promises to expand this next-generation network to cover nearly 100% of the United States by 2024.¹² Indeed, New T-Mobile has committed to invest almost \$40 billion deploying advanced new infrastructure over the next three years.¹³ This means NHCOA’s communities throughout the country will have increased access to New T-Mobile’s mobile network.

The applicants also project that access to the New T-Mobile’s 5G network will be more affordable than access to other wireless carriers’ networks. According to the companies, as New T-Mobile expands its capacity, the cost of delivering each gigabyte of data to customers will go

¹¹ See Public Interest Statement at 101.

¹² See Public Interest Statement at 27, Figure 5.

¹³ See Public Interest Statement at 15 & n.40 (citing Declaration of G. Michael (“Mike”) Sievert, President and Chief Operating Officer, T-Mobile, US, Inc., Appx. C, ¶¶ 12, 15 (“Sievert Decl.”)).

down, allowing New T-Mobile to offer lower prices than Verizon and AT&T.¹⁴ Verizon and AT&T will respond by lowering their prices to compete with New T-Mobile, resulting in as much as a 55% decrease in price per gigabyte and a 120% increase in cellular data supply for all wireless customers.¹⁵ This is particularly important to the many low-income, elderly Hispanic consumers depending on access to affordable mobile broadband.

IV. CONCLUSION

All told, the merger promises to deliver many public benefits that will directly improve the lives of NHCOA's communities. New T-Mobile has the potential to offer a high-capacity 5G network that can support many new health care applications that will benefit elderly Hispanics. The combination also promises to make this network accessible to nearly the entire country just a few short years post-closing at prices that seem likely to deliver much-needed cost-savings to all consumers. The Commission should approve the T-Mobile/Sprint merger.

Respectfully submitted,

National Hispanic Council on Aging

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¹⁴ See Public Interest Statement at i & n.1 (citing Sievert Decl. ¶ 21).

¹⁵ See Public Interest Statement at ii & n.2 (citing David S. Evans, Market Platform Dynamics, "Economic Analysis of the Impact of the Proposed Merger of T-Mobile and Sprint on the Deployment of 5G Cellular Technologies, the 5G App Ecosystem, and Consumers, Enterprises, and the Economy," Appx. G, Section V.C., ¶¶ 220-44).