



September 11, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

In accordance with Section 1.1206(b)(2)(i) of the Commission's rules, the National Rural Education Association ("NREA") submits this letter in support of the proposed transaction between T-Mobile USA, Inc. ("T-Mobile") and Sprint Corporation ("Sprint"). NREA has long supported measures that the FCC or private companies have taken to increase broadband access for rural communities. The FCC now is considering a monumental merger between T-Mobile and Sprint that has the promise of bringing true broadband capabilities to many parts of the country that currently lack options for high-speed internet access. Accordingly, NREA files these comments in support of the merger.

The NREA was originally founded as the Department of Rural Education in 1907. It is the oldest established national organization of its kind in the United States. Through the years it has evolved as a strong and respected organization of rural school administrators, teachers, board members, regional service agency personnel, researchers, business and industry representatives, and others interested in maintaining the vitality of rural school systems across the country. NREA is led by an executive committee consisting of national representatives of rural school administrators and teachers, state education agencies, educational service agencies, higher education institutions, rural school district boards, and at-large constituencies. Today, NREA continues to serve as the leading voice of rural communities and schools across the United States.

Access to broadband is critical for all communities. Local governments, schools, medical facilities, and many more institutions use the Internet to communicate with their constituents, students, patients and customers. In addition, the Internet provides a means for communities to diversify their economic base and to reach services and products that are not available locally. The FCC has taken steps to expand broadband to previously unserved or underserved areas through the Universal Service Fund. However, those programs are limited in their scope. For example, the Schools and Libraries

program has allowed service providers to deliver broadband to many schools across the country. And while that program has seen some success, many students lose their connection to the Internet as soon as they leave campus.

As the FCC knows too well, many communities simply do not have any choice in their service provider and some even lack access to broadband at all. 14 million Americans living in rural areas across the country currently do not have access to wireless broadband services with download speeds of 10 Mbps or more. Importantly, we are on the cusp of a transformation of the broadband industry. Wireless operators are beginning to deploy their new 5G networks that promise to revolutionize the way consumers access and use the Internet. NREA believes that rural communities should benefit from the 5G revolution and that the merger between T-Mobile and Sprint will help bring better 5G service to rural communities faster than otherwise would occur.

T-Mobile and Sprint filed a public interest statement that clearly demonstrates the plans that “New T-Mobile” has to extend improved 4G LTE and 5G service to rural communities across the country. New T-Mobile plans to provide 84.2 percent of rural residents with in-home broadband of at least 25 Mbps, which means students across the country will have the chance to do their homework at home – not at their local McDonalds or coffee shop. In addition, students in rural communities often have long commutes to and from school. It is not uncommon to have students ride a bus for more than 45 minutes or more each way. If students had access to broadband while commuting to and from school, they could spend that time on school buses doing homework. New T-Mobile promises to expand outdoor wireless coverage to almost 60 million (95.8%) rural residents, which means students will have the chance to better utilize their time traveling to and from school.

Finally, if T-Mobile and Sprint meet their promised deployment goals, NREA believes that other providers, both wireless and wired, will have strong incentives to upgrade the services they offer to rural areas. In other words, rural areas that frequently lack meaningful choices in broadband service providers, would finally begin to see the type of competition that urban and suburban communities have benefited from for years.

NREA understands that the aforementioned improvements only will be deployed if this merger is approved. Accordingly, NREA supports the proposed merger between T-Mobile and Sprint. New T-Mobile’s commitment to serving rural areas with modern networks is exactly what rural communities across the country need. Please contact me if you have any questions concerning this letter.

Respectfully submitted,



Dr. Allen Pratt, Ed. D.
Executive Director
National Rural Education Association