



AMERICANS FOR LIMITED GOVERNMENT

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September 10, 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, WT Docket No. 18-197

Dear Ms. Dortch,

Consistent with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, Americans for Limited Government submits the following material in support of the proposed transfer of control of Sprint Corporation to T-Mobile US, Inc.

Creating a robust nationwide 5G network is going to require more spectrum. The T-Mobile-Sprint proposed merger will enable more of this critical resource to be utilized for 5G operations, for the benefit of the public.

T-Mobile and Sprint already have plans to roll out some 5G operations, utilizing the 600 MHz and 2.5 GHz bands, respectively, along with the companies' other spectrum assets.¹ Following a merger approval, the combined company will be able to deploy 5G facilities simultaneously across low- and medium-band spectrum, thereby building out a robust nationwide 5G network for millions of customers. The combined company will also be well-positioned to deploy 5G systems in high-band spectrum (above 3 GHz) in the future.

The proposed merger will help achieve CTIA's standard for 5G,² enabling data rates as high as 10 gigabits per second, 100 times faster than today's 4G speeds of 100 megabits per second. 5G providers will need low-, medium-, and high-band spectrum in order to be competitive and create nationwide 5G networks. For 5G, "more is more." Together, Sprint and T-Mobile will fill in each other's spectrum gaps.

¹ https://api.ctia.org/wp-content/uploads/2018/04/Analysys-Mason-Global-Race-To-5G_2018.pdf#page=27

² https://api.ctia.org/wp-content/uploads/2018/04/Analysys-Mason-Global-Race-To-5G_2018.pdf

The proposed merger will generate great benefits in the existing 5G marketplace currently dominated by Verizon and AT&T, by enhancing data speeds and fostering more competition. Verizon and AT&T are already responding to market developments by upgrading their own networks. The proposed merger will help facilitate industry fulfillment of the promise of 5G by lowering costs and increasing data capacity for consumers.

Wireline broadband needs more competition, too. T-Mobile-Sprint's 5G offerings will foster such competition by allowing consumers to cut the cord and just go wireless, utilizing their cellular plans for home Internet access. More home broadband Internet options will equal lower costs for consumers.

Unlike other media mergers, T-Mobile-Sprint is neither a content deal nor a case of mass media consolidation. Instead, this transaction will result in more robust competition in the wireless marketplace, more bona fide competitors, and more and faster connectivity for consumers.

A 2017 Accenture study estimated that the wireless industry move to 5G will create 3 million new jobs in the U.S., including in the construction of 5G infrastructure, and will add \$500 billion to the nation's Gross Domestic Product.³ The T-Mobile-Sprint merger, along with other market developments, will position the U.S. to take a commanding lead on 5G. Overall, the push to 5G will reshape the U.S. and global economies in ways that were unimaginable just a few years ago. Faster 5G mobile networks will not only make videos and Internet connectivity available at lightning quick speeds, but will also support smart cities, driverless vehicles, robot operations, and more.

But to get there, this country's wireless marketplace needs more competition. The T-Mobile-Sprint merger will fulfill that need, benefiting consumers and avoiding any antitrust issues. The combined company will help bring low-cost, high-speed broadband Internet services to the entire nation.

Sincerely,



Robert Romano
Vice President of Public Policy
Americans for Limited Government

cc: (via email)
Chairman Ajit Pai
Commissioner Michael O' Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel

³ https://www.accenture.com/t20170222T202102_w_us-en_acnmedia/PDF-43/Accenture-5G-Municipalities-Become-Smart-Cities.pdf