September 17, 2018

**VIA ELECTRONIC FILING**

The Honorable 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:

I am submitting the following comments regarding the proposed merger of T-Mobile US, Inc. and the Sprint Corporation, companies that have become major U.S. employers. Given the global heritage of both companies, I thought it important to highlight the tremendous benefits that international companies provide the U.S. economy and workforce.

As you may know, the Organization for International Investment (OFII) is the only organization focused exclusively on supporting the international business community in Washington. Representing the U.S. operations of many of the world's leading international companies, OFII ensures that policymakers at the federal, state and local level understand the critical role that foreign direct investment (FDI) plays in America’s economy. OFII advocates for fair, non-discriminatory treatment of foreign-based companies and promotes policies that will encourage them to establish U.S. operations, which in turn increases American employment and U.S. economic growth.[[1]](#footnote-2)

More than 6.8 million U.S. workers are directly employed by international companies across America. U.S. workers at international companies earn wages and benefits totaling more than $79,000 annually, 24 percent higher than the economy-wide average. International companies employ 20 percent of America’s manufacturing workforce and created 54 percent of all new U.S. manufacturing jobs in the past five years.

International companies help regional economies grow by sourcing much of their supply chain from U.S. small businesses. For every U.S. job at an international company, three more are supported in the U.S. economy.

U.S. workers of international companies produce 23 percent of U.S. exports, shipping nearly a billion dollars in goods a day to customers around the world. These employers reinvest $100 billion annually into their U.S. operations, import world-class workforce development programs and spur U.S. companies to increase productivity through competition.

American scientists and engineers employed by international companies are leading our nation’s innovation advantage. International employers spend more than $57 billion on research and development activities, or 16 percent of all R&D performed by U.S. companies.

International companies also broaden America’s economy and make it more resilient to economic downturn. When international companies invest here, it means their home countries now have a stake in America’s economic success.

The United States remains the top market for FDI because of our longstanding open investment policy, strong capital markets, culture of innovation, and competitive workforce.

I hope that you will consider these very important, positive economic factors when assessing the proposed merger of T-Mobile US, Inc. and the Sprint Corporation. Given the significant U.S. employment and investment these companies have made into the U.S. economy, I urge you to decide this matter based on the merits of the deal and not on the global heritage of the companies.

Consistent with section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, OFII submits the attached material to the docket for the proposed transfer of control of Sprint Corporation to T-Mobile US, Inc.

Thank you for the opportunity to contribute. Please feel free to contact me with any questions.

Respectfully submitted,

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|  | cid:image001.jpg@01D29BE8.28846950  Nancy McLernon  President & Chief Executive Officer  Organization for International Investment  1225 19th Street, N.W. Suite 501  Washington, DC 20036 |

cc: (via email)

Chairman Ajit Pai

Commissioner Michael O’Rielly

Commissioner Brendan Carr

Commissioner Jessica Rosenworcel

1. *See* the OFII website for a full list of members at [*https://ofii.org/about-us/membership*](https://ofii.org/about-us/membership). The parent-companies of OFII members (the U.S. subsidiaries are OFII members) are largely from European countries. Our members’ global connections reach six continents. [↑](#footnote-ref-2)