

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

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

COMMENTS OF THE NATIONAL HISPANIC MEDICAL ASSOCIATION

The National Hispanic Medical Association (“NHMA”) respectfully submits these comments in support of the T-Mobile US, Inc. (“T-Mobile”) and Sprint Corporation (“Sprint”) merger.¹ NHMA’s vision is to be the national leader to improve the health of Hispanic populations. By expanding high-quality broadband connectivity nationwide, the combined company’s 5G network will increase access to high-quality health care, spawn innovation in the medical field, create new efficiencies, and help reduce the cost of medical care for all Americans, including Hispanic communities in the United States. For these reasons, NHMA urges the Commission to approve the transaction.

I. INTRODUCTION

Established in 1994 in Washington, D.C., the NHMA is a non-profit association representing the interests of 50,000 licensed Hispanic physicians in the United States. NHMA’s mission is to empower Hispanic physicians to lead efforts to improve the health of Hispanic and other underserved populations in collaboration with Hispanic state medical societies, residents, medical students, and other public and private sector partners. As a rapidly growing national organization, NHMA: (1) serves as a resource to the White House, Congress, and the federal

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”).

government; (2) develops leadership for public health and private sector boards and C-suite positions; and (3) provides networking opportunities with stakeholders who impact Hispanic health. Among other things, NHMA provides policymakers, health care providers, and our partners with expert information and support in strengthening health service delivery to Hispanic communities across the nation. For almost 25 years, NHMA has witnessed as the incredible changes in medical innovation and progress too often leave Latinos out of those benefits. The deployment of 5G services and technologies will bring yet another wave of innovation and promises to transform medical care. Expanding robust, reliable and accessible next-generation broadband service across the nation is therefore not only an important communications policy goal but also an essential element in ensuring access to affordable, high-quality medical care for all Americans—including the Hispanic community. The T-Mobile and Sprint merger can help.

II. BY EXPANDING ROBUST, RELIABLE AND ACCESSIBLE BROADBAND SERVICE NATIONWIDE, THE COMBINED COMPANY’S 5G NETWORK WILL ALSO INCREASE ACCESS TO HIGH-QUALITY HEALTH CARE, FOSTER INNOVATION, AND REDUCE HEALTH CARE COSTS.

By expanding robust and reliable broadband service across the United States, the combined T-Mobile and Sprint 5G network will also increase access to high-quality medical care, foster innovation, and reduce health care costs across the board.

Ten years ago, it would have been hard to imagine a device in your pocket that could track your heart rate, steps, and sleep cycle, while keeping you seamlessly connected to the digital world. Today, these devices are commonplace and over 60 percent of consumers are ready to use wearables as a preventative health measure.²

² See Ericsson, *From Healthcare to Homecare, The critical role of 5G in healthcare transformation* 4 (June 2017), <https://www.ericsson.com/en/trends-and-insights/consumerlab/consumer-insights/reports/transforming-healthcare-homecare#pageheader>.

With 5G on the horizon, this medical technology revolution is just beginning. Medical devices such as wearables, along with the wireless and internet infrastructure that support them, are helping launch a revolutionary phase for medical care and creating key market opportunities for sensory devices, wearables, and continuous, remote health monitoring. For example, 70 percent of consumers worry about older patients being left unattended.³ 5G networks—with their capacity for real-time interactivity and sharing of information—promise to help address concerns such as these. 5G network capabilities will also help the medical community improve and expand telemedicine offerings, instantaneously connecting patients with doctors hundreds of miles away. Given that access to care remains a hurdle for many in the Hispanic community, next-generation technologies and services that eliminate barriers to obtaining medical advice can significantly improve the health and well-being of this segment of the U.S. population.

The positive effects of 5G on health care will also be measurable on a larger scale. 5G networks, and the data processing that these networks will enable, stand to positively modernize standard health care business models and lower patient costs through a push towards value-based care built upon outcome-based models (rather than traditional “volume-based fee-for-service” systems). Last year, Goldman Sachs estimated a shift to value-based care could produce \$650 billion in savings by 2025.⁴ This would undoubtedly help put a dent in the estimated \$1.4 trillion

³ See *id.* at 6.

⁴ See David J Teece, *5G Mobile: Impact on the Health Care Sector* 11 (Oct. 26, 2017) (“5G Mobile: Impact on the Health Care Sector”), <https://www.qualcomm.com/media/documents/files/5g-mobile-impact-on-the-health-care-sector.pdf> (citing Goldman Sachs Global Investment Research, “*Healthcare’s Holy Grail: Better Outcomes at Lower Costs*,” (Feb.2017)).

in annual health care waste in the United States⁵ and put more money back in consumers' pockets.

But these benefits cannot be fully realized without robust, reliable, and accessible nationwide networks that offer high-capacity, low-latency, and high-speed connectivity to all segments of the population. Currently, only 46% of Latinos have high-speed broadband service at home (lagging behind 55% for the black community and 73% for white Americans),⁶ which means they lack access to technologies such as continuous health monitoring. Latinos are also among the most likely groups to access the internet using a mobile device.⁷ This means that the need for lower-cost, higher-quality mobile wireless broadband is especially critical to Hispanics.

In this context, NHMA is a natural—and enthusiastic—supporter of the T-Mobile and Sprint transaction. T-Mobile and Sprint have announced that the merger will allow the combined company to invest nearly \$40 billion to bring its network into the 5G future.⁸ With their new network, the combined T-Mobile and Sprint promises to significantly expand wireless coverage, increase network capacity, and improve signal quality.⁹ This will help bring reliable service to more unserved or underserved Americans, Hispanic and otherwise, and strengthen existing communications networks that are critical to medical service providers. The network's ability to transmit high-resolution video and audio to distant physicians will ensure access to

⁵ See 5G Mobile: Impact on the Health Care Sector at 11.

⁶ See Anna Brown, Gustavo López, and Mark Hugo Lopez 4 “*Digital Divide Narrows for Latinos as More Spanish Speakers and Immigrants Go Online*” (Pew Research Center, July 20, 2016) (“Digital Divide Narrows for Latinos”), http://assets.pewresearch.org/wp-content/uploads/sites/7/2016/07/PH_2016.07.21_Broadbank_Final.pdf.

⁷ See *id.* at 4.

⁸ See Public Interest Statement at i.

⁹ See *e.g., id.* at at ii.

higher-quality medical care faster, without having to travel long distances, for more Americans.¹⁰ Importantly, the network's expanded capacity will reduce the cost of delivering each gigabyte of data to customers, rendering service more affordable for consumers, including medical providers eager to expand their telemedicine offerings.¹¹ Looking into the future, the combined company's powerful nationwide 5G network will also have the capability to support a wide range of connected medical devices, which will foster innovation in the space and carry us into the next medical revolution.¹²

III. CONCLUSION

NHMA is confident that by making high-capacity, low-latency, and high-speed connectivity accessible to more Americans, the combined T-Mobile and Sprint 5G network will improve the quality of medical care in the United States and reduce its cost. In addition, the capabilities of the new company's 5G network promise to be a catalyst for medical innovation. This is a win for all Americans but especially to Hispanics, who are too frequently late to benefit from medical advances that improve patient outcomes and increase quality of life. The T-Mobile and Sprint merger is, in this way, an opportunity for the Commission to help level the playing field. For these reasons, the NHMA supports the T-Mobile and Sprint merger and urges the Commission to approve the transaction.

¹⁰ *See id.* at 57.

¹¹ *See id.* at i-ii.

¹² *Cf. id.* at 56-57.

Respectfully submitted,

NATIONAL HISPANIC MEDICAL ASSOCIATION

By: /s/ Dr. Elena Rios

Elena Rios, MD, MSPH, FACP

President & CEO

National Hispanic Medical Association

1920 L St NW Suite 725, Washington, DC 20036

(202) 628-5895

September [[XX]], 2018