

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**COMMENTS OF HISPANIC HERITAGE FOUNDATION**

The Hispanic Heritage Foundation (“HHF”) supports the proposed merger of T-Mobile and Sprint because it will produce important benefits to American-Latino entrepreneurs, underrepresented communities, cost-conscious consumers, rural customers, and other populations.

HHF was founded in 1987, in conjunction with the establishment of Hispanic Heritage Month, with the goal of honoring notable Hispanic Americans who have distinguished themselves and made a positive impact in a wide variety of fields through the Hispanic Heritage Awards. The Awards quickly became one of the highest honors for Latinos by Latinos. Over the last 20 years, HHF has focused on education, workforce development, leadership, and culture-based initiatives and programs, which have been nationally and internationally recognized for their impact.

Many of HHF’s award-winning programs focus on access to technology including the Code as a Second Language (CSL) program which introduces and teaches thousands of minorities how to code. HHF has also tackled the equity gap in education because of lack of access to broadband, called the Tech Edquity initiative. HHF also hosts “hackathons” to

encourage youth to be social innovators and entrepreneurs but that can't happen without stronger access to broadband and technology. The merger will address these tech gaps through significant network improvements. Latino families are less likely to have broadband or a computer at home and more likely to rely on a smartphone for Internet access.<sup>1</sup> We are encouraged that the merger will accelerate deployment of the first nationwide 5G network, helping to close the digital divide and homework gap and bring about advanced wireless technologies and services with innumerable benefits. The ultra-high-speed wireless broadband delivered over New T-Mobile's 5G network, for example, will allow Hispanic Americans to enjoy viable in-home internet where such options do not readily exist today.<sup>2</sup>

HHF is also confident that the benefits of a nationwide 5G will improve the lives of their constituents who are predominantly low-income and many are rural customers. T-Mobile has long been popular with cost-conscious consumers; and economies of scale from the merger will allow T-Mobile to continue offering highly competitive prices, bringing the benefits of 5G to all.<sup>3</sup> Furthermore, we note that the merger will lead to greater choice and coverage for underserved rural customers, as T-Mobile has committed to expand into additional rural markets by opening 600 new stores in sparsely populated areas of the United States.<sup>4</sup>

T-Mobile has also been consistently been recognized for its commitment to diversity and communities of color. According to a June 2018 survey, T-Mobile CEO John Legere was named

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<sup>1</sup> U.S. CENSUS, *The Digital Divide: Percentage of Households by Broadband Internet Subscription, Computer Type, Race and Hispanic Origin* (Sept. 11, 2017), <https://bit.ly/2MohDq9>.

<sup>2</sup> *Public Interest Statement* at 58-64.

<sup>3</sup> *Id.* at 51-55.

<sup>4</sup> *Id.* at 64-69.

the best CEO for diversity among large companies of 500 employees or more.<sup>5</sup> We are gratified that he will continue leading the New T-Mobile, with Latino and Sprint CEO Marcelo Claure on the board of directors. *Latino Magazine* recently named T-Mobile as one of the 30 Best Employers for Latinos, based on a holistic review of criteria including “number of Latino employees; programs to recruit, promote and retain Latinos; outreach programs (both internal and external); and Latino representation in the boardroom, management and supply chain.”<sup>6</sup> A third of T-Mobile’s workforce of Hispanic heritage, and T-Mobile has a large and growing minority and diverse supplier program that conducts outreach to Latino entrepreneurs, including the U.S. Hispanic Chamber of Commerce, which supported the merger as “promising for the Hispanic business community in both rural and urban areas.”<sup>7</sup>

We are encouraged by T-Mobile’s commitment to grow its supplier diversity program by developing and sourcing existing and new Hispanic-owned enterprises through technical assistance and capacity building initiatives, as well as sponsoring matchmaking events to connect T-Mobile buyers with Hispanic suppliers. We believe that T-Mobile’s credible commitment, alongside the \$40 billion of dollars of investment that the New T-Mobile has pledged to spend over the next three years alone,<sup>8</sup> will increase the number of jobs and growth opportunities for the next generation of Latino leaders.

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<sup>5</sup> Dixita Limbachia, *Top-rated CEOs for diversity: Leaders of T-Mobile, Intuit and HubSpot*, USA TODAY (June 6, 2018), <https://usat.ly/2sMdbJg>.

<sup>6</sup> Alan Goforth, *The Best Employers for Latinos 2018*, LATINO LEADERS (Feb. 28, 2018), <https://bit.ly/2MpSafY>.

<sup>7</sup> Press Release, *USHCC Applauds Benefits The T-Mobile-Sprint Merger Will Bring to The Hispanic Business Community* (June 19, 2018), <https://bit.ly/2M7Q0Fa>.

<sup>8</sup> *see also* Description of Transaction, Public Interest Statement, and Related Demonstrations, WT Docket No. 18-197, at iv (filed June 18, 2018) (“*Public Interest Statement*”).

HHF supports the merger of T-Mobile and Sprint, and it urges the Commission to keep in mind the benefits to underrepresented communities when evaluating the public interest, convenience, and necessity of the transaction.

Respectfully submitted,

**HISPANIC HERITAGE FOUNDATION**

A handwritten signature in black ink, appearing to be 'JT' with a horizontal line extending to the right.

/s/ José Antonio Tijerino

José Antonio Tijerino  
President and CEO  
Hispanic Heritage Foundation

September 17, 2018