

VIA ELECTRONICALLY ONLY

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

RE: Applications of T-Mobile U.S., Inc., and Sprint Corporation for Consent to Transfer Control of Licenses and Authorizations (WT Docket No. 18-197)

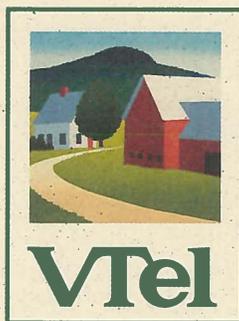
Dear Ms. Dortch,

VTel Wireless recently submitted the attached comments to the Senate Subcommittee on Antitrust, Competition Policy and Consumer Rights, regarding the Subcommittee's June 27, 2018, hearing on the T-Mobile/Sprint transactions. The letter discusses VTel's collaboration with T-Mobile and Sprint to accelerate deployment of VTel's LTE-capable network in one of the Nation's most rural states. I respectfully request that the Commission file this letter, and the attached comments, in the docket associated with the transaction (WT Docket No. 18-197).

If you have any questions, please feel free to contact me at the number shown below.

Best regards,

Michel Guité
Chairman & CEO



June 15, 2018

The Honorable Mike Lee

Chairman

Subcommittee on Antitrust, Competition Policy and Consumer Rights

361A Russell Senate Office Building

Washington, DC 20510

The Honorable Amy Klobuchar

Ranking Member

Subcommittee on Antitrust, Competition Policy and Consumer Rights

302 Hart Senate Office Building

Washington, DC 20510

Dear Chairman Lee & Ranking Member Klobuchar,

I understand from media reports that, on June 27, 2018, your Subcommittee will hold a hearing to explore the proposed merger of T-Mobile and Sprint. As a small wireless provider, serving a predominately rural state such as Vermont, I wanted to share VTel Wireless's views on the merger, and specifically, why we believe this proposed merger serves the interests of not only Vermonters but also all rural Americans. Accordingly, I respectfully request that you make our views part of the hearing record.

When VTel Wireless began its rural Vermont build in 2012, many warned of the risks of building a 100% 4G wireless network without having or simultaneously constructing costly, arguably obsolete, but almost ubiquitous 2G and 3G facilities. No one else had tried 100% 4G LTE. The aphorism "*fools rush in, where angels fear to tread*" was clearly afoot in Springfield, and we went forward.

We could not have completed this buildout or successfully deployed 100% 4G LTE without initiatives by T-Mobile and Sprint designed to help rural wireless companies like VTel Wireless. Sprint engineers worked with us intensely for the past two years, integrating R&D by Ericsson, Syniverse, Samsung, Apple, Sprint, and VTel Wireless, for 4G LTE data roaming. We also have agreements in place to begin network integration with T-Mobile to turn-up 100% 4G Voice over LTE roaming in the next few months.

From what I can see, most rural wireless carriers in America today, which traditionally have been dependent on 2G and 3G voice roaming revenues, are barely surviving. Some ten years ago, there were approximately 165 rural wireless independents in the United States. Today, approximately 95 remain.

The problem is that, as the largest nationwide mobile carriers have become more dominant, former rural wireless partners increasingly are seen as competitors, whose geographic areas should be overbuilt and roaming fees slashed. Thankfully, Sprint and T-Mobile have developed an opposite strategy, seeking to develop and maintain a collaborative partnership with rural independent wireless carriers.

In my view, a combined Sprint/T-Mobile would have a positive impact at the local Vermont level. With the accelerant of VTel Wireless' 100% 4G LTE network, and Sprint/T-Mobile's more urban facilities, Vermonters would enjoy faster mobile speeds and enhanced wireless service on a daily basis.

Additionally, a combined Sprint/T-Mobile would undoubtedly create a stronger, more innovative, deeply needed, powerful 4G/5G competitor in the U.S. It also would, I believe, help many or most of the remaining rural independent wireless operators like VTel Wireless to similarly become more innovative and competitive. Enabling other rural independent wireless carriers to migrate to 100% 4G LTE, while also providing a path forward to move to 5G, would seem good for everyone.

Sincerely,



Michel Guité
Chairman and CEO

Cc: The Honorable Patrick Leahy