



601 Pennsylvania Avenue, NW  
North Building, Suite 800  
Washington, DC 20004

November 21, 2017

*Via ECFS*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Support for Early Puerto Rico and U.S.V.I. Post-Auction TV Transition  
GN Docket No. 12-268; MB Docket No. 16-306

Dear Ms. Dortch:

T-Mobile USA, Inc.<sup>1</sup> (“T-Mobile”) supports the November 14, 2017, request of the coalition of television broadcast station licensees in Puerto Rico and the U.S. Virgin Islands (the “Coalition”) for revision of the Post-Auction Broadcast Transition phase assignments and deadlines for stations in the islands to allow a “pre-Phase 1” transition.

Allowing an early transition of the television stations in Puerto Rico and the U.S. Virgin Islands would serve the dual policy objectives of repurposing spectrum for wireless broadband use while ensuring continued vitality of the television broadcast industry. As the islands recover from hurricane devastation, it is more critical than ever that more robust wireless broadband services be rapidly deployed for consumers and public safety. T-Mobile is committed to quickly building out and turning on its new 600 MHz spectrum in Puerto Rico; thus, permitting an early transition would yield numerous benefits for broadcasters, T-Mobile, and, most importantly, consumers. Furthermore, T-Mobile stands ready and willing to provide technical and practical assistance to affected broadcasters in Puerto Rico and the U.S. Virgin islands, if requested, to accomplish an early transition.

As noted by the Coalition, acceleration of the repack for the reassigned TV stations of Puerto Rico and the U.S. Virgin Islands has real, practical benefits for broadcasters and, in turn, will benefit the overall transition plan and enable rapid deployment of new wireless services. Requiring the affected stations to wait until 2019 (and some, until late 2020) to transition to their new channel assignments likely will create confusion and delay of the transition on the islands. Based on our own conversations with station owners as well as reports from our technical personnel on the ground, TV stations across the islands are slowly returning to the air, but most are unable to return to full operations without major capital expenses – not to mention that

---

<sup>1</sup> T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly-traded company.



stations and wireless carriers are still waiting on full restoration of the electrical power grid, something we are told remains months away for many of the broadcast tower locations. An early repack would prompt broadcasters to take advantage of this interim operations period to rebuild once, rather than require a rebuild of current facilities only to be built again in less than two years' time.

Like broadcasters, T-Mobile's network on the islands was also heavily damaged by Hurricane Maria. Allowing broadcasters to transition early will facilitate T-Mobile's strengthening coverage by including 600 MHz equipment. Unlike other carriers, T-Mobile does not have low band spectrum which is necessary to deploy a widespread LTE network with both depth of capacity and breath of coverage. Consequently, this early repacking of the 600 MHz provides an important opportunity for citizens in Puerto Rico to benefit from improved access to broadband as the recovery continues.

For the foregoing reasons, T-Mobile supports the Coalition's request for an accelerated, "pre-Phase 1" broadcast television transition schedule for the reassigned stations in Puerto Rico and the U.S. Virgin Islands.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy  
T-Mobile USA, Inc.  
(202) 654-5900

cc: Jean Kiddoo  
Hillary DeNigro  
Zenji Nakazawa  
Rachael Bender  
Alison Nemeth  
Michael Carowitz  
Barbara Kreisman  
Sasha Jahvid  
Nancy Murphy