



December 7, 2018

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

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**Re: Comments in Opposition to the Merger of Applicants T-Mobile US, INC. and Sprint Corp.,
WT Docket No. 18-197.**

Dear Ms. Dortch:

On behalf of the Saint Paul Regional Labor Federation (SPRLF), I appreciate the opportunity to comment on the Federal Communications Commission (FCC) review of the merger application of T-Mobile US, Inc. (T-Mobile) and Sprint Corp. (Sprint). The SPRLF is an umbrella federation of more than 140 local unions representing more than 50,000 working people, including those employed in the relevant markets, as well as their families who rely on reliable and affordable wireless service. The SPRLF strongly opposes the merger of these two competitors in the mobile telephony/broad band services and prepaid wireless retail services markets as the merger is currently structured.

The proposed merger between Sprint and T-Mobile raises serious concerns about further market concentration within the mobile telephony and prepaid wireless markets which have already "highly concentrated" per the Department of Justice 2010 Horizontal Merger Guidelines. One can reasonably foresee that the merged corporation will result in the relevant markets becoming increasingly anti-competitive, resulting in harm to consumers in the forms of higher prices, reduced choice and, ultimately, lower quality service for low-income, urban, and rural customers.

The Communication Workers of America, New Street Research and MoffettNathanson Research predict that the T-Mobile and Sprint merger will result in between 20,000 and 30,000 workers losing their jobs. Job losses will be experienced by people who are displaced through the closures of retail prepaid and postpaid wireless stores, as well as by people who are made redundant at corporate headquarters as a result of the merger.

In order to justify the proposed merger in the face of its clear anti-competitive outcomes, T-Mobile and Sprint must show public benefits that outweigh the harm. Higher prices for consumers, and massive job losses for people who work for the corporations are not in the public interest. T-Mobile and Sprint have failed to show that the merger would provide public benefits that outweigh the harms that the transaction will create. Therefore, the proposed merger is not in the public interest and should be rejected by the Federal Communications Commission.

Sincerely,

Robert "Bobby" Kasper, President
Saint Paul Regional Labor Federation

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