

October 16, 2014

**VIA ELECTRONIC FILING**

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

*Re: Applications of AT&T and DIRECTV Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90*

Dear Ms. Dortch:

We are writing to ask that as the Commission considers AT&T, Inc.'s proposed acquisition of DIRECTV, it give significant consideration to the strong broadband investment and deployment commitments AT&T has put forward.

The Information Technology Industry Council (ITI), represents 60 of the nation's leading information and communications technology companies, including smartphone manufacturers, providers of computer hardware and software, Internet services, and wireline and wireless networking equipment.<sup>1</sup> ITI advocates for policies that enable technological experimentation, innovation, deployment, and adoption; chief among those is promoting broad deployment of robust, affordable, high-speed broadband. ITI has long held that it will take a partnership between public and private sector interests to ensure all Americans have access to this essential service. The commitments to deploy fixed wireless local loop technology to bring broadband with speeds of up to 20 Mbps to approximately 13 million new AT&T customers – many rural, underserved, or unserved – is a significant step toward meeting our nation's broadband needs.<sup>2</sup>

Consumers would enjoy significant benefits as a result of these broadband commitments. Americans are increasingly viewing a broadband connection as essential to their daily lives, even more important than television or phone service.<sup>3</sup> Broadband is also ever more essential for access to educational and employment opportunities, basic government and household services, as well as health monitoring services.

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<sup>1</sup> For more information on ITI, including a list of its member, please visit <http://www.itic.org/about/member-companies.dot>.

<sup>2</sup> *Applications of AT&T and DIRECTV Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-90, at 5, 8 (June 11, 2014).

<sup>3</sup> See Pew Research, Internet Project, *The Web at 25 in the US*, <http://www.pewinternet.org/2014/02/27/the-web-at-25-in-the-u-s/>.



The commitments offered by AT&T to expand the combined company's broadband footprint significantly, particularly in rural areas with no or limited broadband service choices, thereby increasing access or competition for millions of Americans, will provide a substantial public benefit. ITI member companies will benefit from such a commitment as well because they make products and offer services that include network equipment, consumer electronics that rely on high-speed Internet connectivity, and ultimately the software and services that many of the newly covered households will utilize.

As the Commission weighs AT&T's proposed acquisition of DIRECTV, ITI asks that serious consideration be given to the public benefits that the parties have set forth in their filings and as we have discussed in this letter.

Respectfully submitted,

A handwritten signature in black ink that reads "Vince Jesaitis".

Vince Jesaitis  
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