

April 1, 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Sprint and Nextel Communications, Inc. Merger  
WT Docket No. 05-63

Dear Ms. Dortch:

This letter is filed on behalf of United Wireless Corporation (“United,” a unit of United Telephone and Communications Associations, Inc.), in support of the above-referenced application for approval of the merger of Sprint and Nextel. United is a new wireless provider, building out service under a Strategic Rural Alliance with Sprint. With its new PCS network, United will offer competitive, state-of-the-art wireless voice and data services to its customers in southwest Kansas. These services will complement telephone service provided by the parent company’s telephone co-operative, United Telephone Association, Inc.; its DSL and ISP services offered through United Communications Association, and its cable TV services.

We believe that United’s parent corporation is a rural communications success story, representative of the Commission’s vision of full availability of the most modern communications and electronic entertainment services to rural areas, provided by local businesses, at fair prices kept reasonable by availability of multiple suppliers. To this end we entered into the PCS business to provide wireless services to our area, which we believed was underserved by existing regional and nationwide carriers. Specifically, the incumbent carriers do not, in our opinion, provide the same levels of nationwide roaming services, data services, rate plans and seamless handoff enjoyed by wireless subscribers in more urban areas. We believed that demand for these services remained high among the rural, largely agricultural community we serve.

Recognizing this need, United’s parent company sought an alliance with a major wireless carrier. Such an alliance is necessary in order to take advantage of the capital, developmental, technological and embedded resources required to provide modern wireless services. As numerous other rural wireless providers have pointed out to the Commission, rural wireless operators compete in a nationwide market. Alliance with a

nationwide carrier is therefore necessary, since the resources required to provide competitive nationwide services would otherwise be out of reach for the rural provider.

United chose to partner with Sprint under Sprint's Strategic Rural Alliance. In making its choice, United considered availability of spectrum, efficiency of technology, and strength of brand. United believes that Sprint's CDMA, IS-2000 / EVDO technologies are the premier air interfaces available both today and for the future. IS-2000's spectral efficiency makes it economically possible for a carrier of modest resources, such as United, to insure that it can meet subscribers' needs for years to come. Sprint's leadership in the IS-2000 technology community contributes to many innovations. United, therefore, considers a strong Sprint to be in the best interest of the wireless industry in general, and United in particular.

United believes the Sprint-Nextel merger is good for the wireless industry and its subscribers in the following ways:

1. Increased support for IS-2000 standard. Sprint-Nextel will enhance IS-2000 and EVDO, through its "Revision A," to support a push-to-talk service to replace Nextel's widely-applauded, but ageing, iDEN standard. The combined company will migrate Nextel's network to the IS-2000 standard, relieving industry uncertainty as to Nextel's 3G technology choice and strengthening IS-2000's position with more subscribers. A strong standard is important for innovation, economy-of-scale, and international acceptance.
2. Greater marketplace presence. Sprint-Nextel's greater marketplace presence will make the consumer more aware of the company and its benefits. United will advertise as a Sprint affiliate and a strong national brand will benefit the company as it develops its network.
3. Technological innovation. Sprint-Nextel will have greater coverage, add wireless multi-media, more robust IP-based business solutions, next-generation wireless services, and improved customer service, made possible by the greater resources of the combined company.

A portion of United's monthly revenue will accrue from Sprint-Nextel roamers passing through its territory. United urges the Commission to address the merger proposal as soon as possible in order to allow the combined company to realize the synergy of its combination, and to relieve any uncertainty in the marketplace. While a merger hangs in the balance, consumers typically hold back on purchasing decisions until the uncertainty is resolved. Such an interim period is costly to the merger participants and the industry in general, as it tends to delay innovation and development until all the issues are worked out. In United's case, just now launching a network, a combined Sprint-Nextel will avoid consumer confusion in making network choices and will help the new network grow to serve more customers more rapidly.

For the reasons listed above, United Wireless believes that the Sprint-Nextel merger is in the public interest by providing more choices and innovation to the combined company's urban subscribers, and to United's own rural customer base. We believe we are not alone

in the rural community and that our rural provider colleagues' subscribers stand to benefit from similar relationships with a strong Sprint-Nextel. United urges rapid Commission approval of the Sprint-Nextel merger.

Sincerely yours,

Craig Mock  
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