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July 18, 2008

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E.  
Washington, DC 20002

**Re: WT Docket No. 08-94**

Dear Ms. Dortch:

Pending before the Commission are applications filed by Sprint Nextel Corporation ("Sprint Nextel") and Clearwire Corporation ("Clearwire") which seek Commission approval for transfer of control of numerous authorizations to a new entity, Clearwire Corporation or "New Clearwire." The Northern Arizona University Foundation, Inc. ("NAUF") hereby submits its comments concerning the application.

NAUF is the licensee of multiple educational broadband service ("EBS") stations. NAUF leases excess capacity to both Clearwire and Sprint Nextel. Therefore, NAUF is well-positioned to comment on the proposed transaction, the public interest benefits of which are manifold.

By means of this transaction, deployment of the first nationwide mobile WiMAX broadband network can at last become a reality. This technology will create the opportunity to deliver new wireless broadband products and services to American consumers, educational institutions, and public safety agencies at speeds that, until now, were only available via wireline broadband services.

In particular, by leveraging leased EBS spectrum and the power of the Internet, NAUF and other EBS lessors will be able to deliver new broadband products and services in the 2.5 GHz band. These capabilities will dramatically enhance the way that students, faculty, and surrounding communities access the Internet -- combining mobility and speed with access anytime and anywhere, whether at home, at school, or on the road.

The proposed transaction will also minimize some of the current operational challenges facing utilization of the 2.5 GHz spectrum. "Swiss cheese" geographic coverage caused by multiple EBS licensees in any given geographic area will be reduced, lessening the costs associated with the coordination of multiple licenses. New Clearwire will also be able to eliminate service coverage gaps which will enhance its ability to deploy this advanced mobile broadband network throughout EBS licensed areas.

Furthermore, approval of the proposed transaction will lead to enhanced competition and consumer choice. New Clearwire intends to permit unaffiliated firms to purchase access to its WiMAX network on a non-exclusive, wholesale basis (Sprint, Comcast, Time Warner, and Bright House have already committed to such non-exclusive agreements), and resell that service at retail to consumers in competition with New Clearwire. New Clearwire also plans to allow customers to purchase devices through other consumer electronics distribution channels, connect to the WiMAX network, and select from a variety of service plans without having to purchase devices from New Clearwire itself. This approach will further one of the important public policy objectives identified by the Commission in connection with the recent AWS/C-Block auction.

Finally, based on the transaction's promise of pooled spectrum resources, New Clearwire will be able to raise \$3.2 billion from strategic investors. Thus, approval of the transaction will greatly facilitate the major capital formation required for this ambitious nationwide project.

In summary, pending approval of this transaction, New Clearwire will have the capacity, scale, and financing necessary to build and operate a broadband structure in the 2.5 GHz spectrum for the benefit of the educational community, consumers, and businesses. For the reasons set out above, NAUF supports approval of the transaction, and urges its swift approval.

Respectfully submitted,



Mason Gerety  
President

