



August 11, 2008

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

In the matter of Verizon Wireless/ Alltel Corporation Transfer of Control Applications,
WT Docket No. 08-95

Dear Ms. Dortch:

For nearly 30 years, the Pacific Research Institute has proposed and endorsed public policies that advance innovation in Silicon Valley. We believe strongly that the planned merger of Verizon Wireless and Alltel Corporation will accelerate the development and adoption of high-speed wireless technologies, opening the door for a new generation of Internet services. By increasing the availability of these technologies, the combination will enhance demand for advanced broadband and spur content providers to offer consumers more choices and lower prices.

This merger will facilitate the nationwide roll-out of 4G LTE technologies, enabling download speeds in excess of 100 Mbps. Because Verizon and Alltel already utilize compatible technologies, they are well-positioned to integrate their networks and ensure that the roll-out of LTE simultaneously reaches both rural and urban customers. The merger will further enable Verizon to most effectively utilize its newly acquired 700 MHz spectrum, creating the first nationwide 4G data network. These technologies will empower customers to enjoy high-speed Internet on both computers and mobile devices, challenging developers to create countless new mobile tools and applications. The resulting burst of innovation will revolutionize communications and vastly improve our quality of life. Allowing this innovation to proceed is unquestionably in the public interest.

The improved range of 4G technologies will also allow more customers to be served with fewer cell-sites. As a result, the overhead costs for new competitors to enter the market will decrease. As companies such as Sprint Nextel increasingly lease space on their cell towers to smaller competitors, new players will face a low barrier to entry. Because the networks operated by Verizon and Alltel have little geographic overlap, customers will not experience a decrease in competition. In contrast, the merger will enhance competition for nationwide advanced broadband networks.

Before an Internet startup can develop a creative new service, investors must feel confident that strong networks exist to deliver it. Without robust networks, there is no

demand because there are no customers. Before customers can benefit from the next revolution in Internet content, companies must be free to create the network that will support it. Verizon and Alltel will lay the groundwork for this network, and the FCC should allow them build it.

Sincerely,



Daniel R. Ballon
Policy Fellow, Technology Studies