

Statements of Third Parties in Support of the Applications

- A. Index of Statements Referenced in the Joint Opposition**
- B. Supporting Statements of Third Parties Not Filed With the FCC**
- C. List of Other Supporting Statements Filed With the FCC
as of June 3, 2011**

Index of Statements Referenced in the Joint Opposition

100 Black Men of America, Inc.

- Benefits the African American community by creating jobs

ADTRAN

- Benefits consumers by increasing access

AFL-CIO, Richard Trumka, President

- Benefits the American economy, consumers and workforce

Alliance for Digital Equality

- Benefits minority groups, workforce and consumers

Amdocs (see ADTRAN)

- Benefits consumers by increasing access

American Association for People with Disabilities

- Benefits persons with disabilities

American Federation of Teachers, Randi Weingarten, President

- Creates educational opportunities

American Foundation for the Blind

- Benefits persons with disabilities

The Arkansas Attorney General, Dustin McDaniel

- Benefits rural communities
- Promotes public health and safety

Asian & Pacific Islander American Health Forum

- Benefits Asian American, Native Hawaiians and Pacific Islander communities
- Benefit tele-health services

Asplundh Tree Expert Co., George Gunther, CIO

- Benefits customers

Association for Competitive Technology

- Good for innovation

Avaya (also a signatory to ADTRAN)

- Benefits consumers by increasing access
- Benefits consumers by promoting innovation

The Baltimore Chamber of Commerce

- Benefit business and consumers

Brocade (see Avaya)

- Benefits consumers by promoting innovation

Cameron International

- Good for improved domestic network coverage and infrastructure development

Charles River Ventures

- Promotes innovation and job creation

The City of Placerville Police Department

- Promote public health and safety

Coalition of Labor Union Women, Karen J. See , President

- Benefits the American workforce

Columbia Urban League

- Benefits African Americans

Communications Workers of America, Larry Cohen, President

- Benefits the American workforce

Community Health Works, Gregory Dent, President and CEO, Macon, Georgia

- Promote access to quality healthcare

Congressman Heath Shuler, State of North Carolina

- Increase broadband access

Consumer Awareness Project

- Benefit consumers

Corning, Timothy Regan, Senior Vice President

- Improve spectrum and increase broadband access

Cuban American National Council

- Benefits minority communities

Dominican American National Foundation

- Benefits Dominican Americans

Economic Policy Institute

- Promotes job creation

Facebook (see Avaya)

- Benefits consumers by promoting innovation

Future 500, William K. Shireman, President and CEO

- Benefits the environment

General Dynamics Wireless Services (See ADTRAN)

- Benefits consumers by increasing access

Governor Mike Beebe, State of Arkansas

- Benefits rural communities
- Benefits local and national economies

Governor Steven L. Beshear, Commonwealth of Kentucky

- Promotes strong business environment

Governor Terry E. Branstad, State of Iowa

- Benefits rural communities

Governor Nathan Deal, State of Georgia

- Benefit all citizens by expanding access to broadband

Governor Mary Fallin, State of Oklahoma

- Promotes economic growth

Governor Nikki Haley, State of South Carolina

- Expands access to broadband

Governor Bill Haslam, State of Tennessee

- Promotes economic growth, job creation and benefits educational systems

Governor John W. Hickenlooper, State of Colorado

- Benefit all citizens by expanding broadband access

Governor Bobby Jindal, State of Louisiana

- Promotes economic growth

Governor Paul LePage, State of Maine

- Benefit rural communities

Governor C.L. "Butch" Otter, State of Idaho

- Promotes economic vitality

Governor Beverly Eves Perdue, State of North Carolina

- Creates economic and educational opportunities

Governor Rick Perry, State of Texas

- Benefits rural communities

Governor Brian Sandoval, State of Nevada

- Benefits rural communities

Governor Rick Snyder, State of Michigan

- Benefits business and consumers

The Grand Rapids Area Chamber of Commerce

- Benefit small business and promote job growth

The Hispanic Institute

- Benefits the Hispanic community

The Hispanic Leadership Fund, Mario H. Lopez

- Benefits Hispanics

The Hispanic Technology & Telecommunications Partnership

- Benefits Americans of Hispanic decent

The Institute for e-Health Policy

- Benefits rural and underserved communities
- Facilitates provision of health-care related services.

International Union of Painters and Allied Trades

- Promotes economic growth and job stimulation

International Brotherhood of Teamsters

- Benefits American workforce
- Modernize network infrastructure

Intertribal Agricultural Council, Ross Racine, Executive Director

- Benefit to Native American tribes and communitites

JDS Uniphase Coporation (See ADTRAN)

- Benefits consumers by increasing access

Jobs for New England NOW

- Benefit the economic climate

Juniper Networks, Mitchell L. Gaynor, Executive Director

- Benefits businesses and consumers

The Kern County Fire Fighters

- Promotes public health and safety

Kleiner Perkins Caufield & Byers

- Promotes economic growth

The Latino Coalition, Hector Barreto, Chairman

- Benefits Americans of Hispanic heritage

Lightspeed Ventures (see Charles River Ventures)

- Promotes innovation and job creation

The Lincoln California Police Department

- Promotes public health and safety

Manhattan (NY) Chamber of Commerce

- Promotes jobs and economic development

Matrix (see Charles River Ventures)

- Promotes innovation and job creation

Mayor Shari Buck, City of North Las Vegas

- Benefits the economy by creating jobs

Mayor Kasim Reed, City of Atlanta, GA

- Promotes innovation and job creation

Microsoft (see Avaya)

- Benefits consumers by promoting innovation

Minority Media and Telecommunications Council

- Benefits minorities

Missouri Chamber of Commerce

- Promotes economic growth

NAACP, Hillary O. Shelton, Director of Washington Bureau and Senior Vice President

- Benefits African Americans

National Action Network

- Benefits minorities by expanding broadband access

National Association for Equal Opportunity in Higher Education, Lezli Baskerville, President and CEO

- Improve access to educational resources

National Association of Black County Officials (See National Coalition of Black Civic Participation)

- Benefits African American Communities

National Association of Neighborhoods, Ricardo Byrd, Executive Director

- Promotes economic growth

National Black Chamber of Commerce

- Promotes Broadband access to underserved community

National Black Farmers Association, John W. Boyd Jr., President

- Benefits small farms
- Benefits African American Communities

The National Coalition on Black Civic Participation

- Benefits African American communities

The National Conference of Black Mayors (See National Coalition of Black Civic Participation)

- Benefits African American communities

National Disability Institute

- Benefits individuals with disabilities

The National Grange, Ed Luttrell, President

- Benefits rural communities

National Newspaper Publishers Association, Danny J. Blakewell, Sr. Chairman

- Benefit rural and minority communities by increasing broadband access

The National Organization of Black Elected Legislative Women (See National Coalition on Black Civic Participation)

- Benefits African American Communities

National Rural Health Association, Alan Morgan, CEO

- Increase access to quality healthcare in rural communities

National Spinal Injury Association/United Spinal Association

- Benefits persons with spinal cord injuries

New Jersey Chamber of Commerce

- Promotes business development and innovation

New Venture Partners (See Charles River Ventures)

- Promotes innovation and job creation

North Dakota Chamber of Commerce

- Good for economic development and job creation

Norwest Venture Partners (See Charles River Ventures)

- Promotes innovation and job creation

Oracle (see Avaya)

- Benefits consumers by promoting innovation

Pantech Wireless, Inc.

- Benefits consumers by increasing access

Pride@ Work

- Benefits LGBT communities

Professional Firefighters of New Hampshire

- Promotes public health and safety

Project Amiga

- Benefits Latinos

Qualcomm (see Avaya)

- Benefits consumers by promoting innovation

Radar Partners (See Charles River Ventures)

- Promotes innovation and job creation

Research In Motion (see Avaya)

- Benefits consumers by promoting innovation

The Sacramento Fire Department

- Promotes public health and safety

San Francisco Chamber of Commerce

- Promotes greater productivity and innovation

Sequoia Capital

- Promotes economic growth

Service Employees International Union

- Benefits workforce

Sierra Club, Michael Brune, Executive Director

- Benefits the environment

Sierra Wireless Inc. (See ADTRAN)

- Benefits consumers by increasing access

Silicon Valley Leadership Group, Carl Gaurdino, President and CEO

- Promotes economic growth

TechNet

- Promotes business development, job creation
- Support deployment of LTE network

Tellabs Operations Inc. (see ADTRAN)

- Benefits consumers by increasing access

Technology Association of Georgia, Tino J. Mantella, President

- Promotes business development and innovation

Technology Crossover Ventures (See Charles River Ventures)

- Promotes innovation and job creation

United Food and Commercial Workers International Union, Joe Hansen, President

- Benefits workforce, consumers and promotes economic growth

United Mine Workers of America

- Benefits rural communities and industry in remote areas

United States Cattlemen's Association

- Benefits rural communities

United States Distance Learning Association, John G. Flores, Ph.D., Executive Director

- Promotes access to educational resources

Urban League of Greater Cleveland

- Benefits minorities and low-income Americans in urban communities

Urban League of Greater New Orleans

- Promotes economic growth and benefits access to educational resources

Urban League of Columbia

- Benefits African American community

Urban League of Metropolitan Denver

- Benefits minorities and low-income Americans in urban communities

Urban League of Metropolitan St. Louis

- Benefits minorities and low-income Americans in urban communities

Urban League of Portland, Oregon

- Benefits minorities and low-income Americans in urban communities

Urban League of San Diego

- Benefit the unserved and underserved

Welch Allyn

- Good for improved domestic network coverage and infrastructure development

West Sacramento Police Department

- Promotes public health and safety

West Virginia Farm Bureau, Charles Wilfong

- Benefits rural communities, local farmers industry and job stimulation

Women Impacting Public Policy

- Benefits consumers and small businesses

World Institute on Disability

- Benefits the persons with disabilities

Yahoo! (See Avaya)

- Benefits consumers by promoting innovation

**BLACK MEN
OF AMERICA, INC..**

April 19th 2011

What They See Is What They'll Be[®]

**LEADERSHIP &
EXECUTIVE COMMITTEE**

ALBERT E. DOTSON, JR., ESQ.
Chairman of the Board

CURLEY M. DOSSMAN, JR.
Vice Chairman of Operations

DR. HOWARD S. RASHEED
Vice Chairman of Programs

JOHN S. KENDALL, ESQ.
Vice Chairman of Development

FRANK L. HAYES
Vice Chairman of Finance

ANTHONY B. O'NEILL, SR., ESQ.
Secretary

JAMES "MAC" HUNTER, ESQ.
General Counsel

MARVIN R. DICKERSON
Member At Large

ROBERT B. TAPLEY
Member At Large

DR. LADELLE OLION
Member At Large

JEFFERY L. JACKSON
Member At Large

PHILIP BANKS, JR.
Member At Large

KEVIN L. PATTERSON
Conventions & Meetings Chair

SAMUEL A. HORTON
Evaluations Committee Chairman

MURVIN S. ENDERS
Chapter Development Committee Chairman

DR. WILLIAM H. HAYLING
President Emeritus

NATHANIEL R. GOLDSTON, III
President Emeritus

THOMAS W. DORTCH, JR.
Chairman Emeritus

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

It has come to our attention that the FCC has opened a docket to allow for public comments on the recently announced acquisition of Deutsche Telekom's T-Mobile USA by AT&T. Please find enclosed a statement from our Chairman, Albert E. Dotson Jr., announcing our support of the acquisition.

We would ask, respectfully, that these comments be included in the appropriate docket, WT 11-65.

Regards,

100 Black Men of America

CC: Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Rick Kaplan, Chief Counsel and Senior Legal Advisor for Chairman Genachowski
John Giusti, Chief of Staff and Legal Advisor for Wireless, Public Safety and International for Commissioner Copps
Angela E. Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless & International for Commissioner McDowell
Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety for Commissioner Clyburn
Charles Mathias, Senior Legal Advisor, Wireless, International and Public Safety Issues for Commissioner Baker

141 Auburn Avenue
Atlanta, Georgia 30303

(404) 688-5100

Fax (404) 688-1028

Website: www.100blackmen.org

Mentoring the 100 Way Across A LifetimeSM

100

**BLACK MEN
OF AMERICA, INC.**

What They See Is What They'll Be®

**LEADERSHIP &
EXECUTIVE COMMITTEE**

ALBERT E. DOTSON, JR., ESQ.
Chairman of the Board

CURLEY M. DOSSMAN, JR.
Vice Chairman of Operations

DR. HOWARD S. RASHEED
Vice Chairman of Programs

JOHN S. KENDALL, ESQ.
Vice Chairman of Development

FRANK L. HAYES
Vice Chairman of Finance

ANTHONY B. O'NEILL, SR., ESQ.
Secretary

JAMES "MAC" HUNTER, ESQ.
General Counsel

MARVIN R. DICKERSON
Member At Large

ROBERT B. TAPLEY
Member At Large

DR. LADELLE OLION
Member At Large

JEFFERY L. JACKSON
Member At Large

PHILIP BANKS, JR.
Member At Large

KEVIN L. PATTERSON
Conventions & Meetings Chair

SAMUEL A. HORTON
Evaluations Committee Chairman

MURVIN S. ENDERS
Chapter Development Committee Chairman

DR. WILLIAM H. HAYLING
President Emeritus

NATHANIEL R. GOLDSTON, III
President Emeritus

THOMAS W. DORTCH, JR.
Chairman Emeritus

PRESS RELEASE

March 22, 2011

FOR IMMEDIATE RELEASE

Statement by the 100 Black Men of America, Inc., Chairman Albert E. Dotson, Jr., Esq. on Announced Acquisition of T-Mobile USA by AT&T

[Atlanta, GA]—"With African American unemployment still hovering above 15%, we welcome the news of AT&T's proposed acquisition, which holds the promise of new jobs, entrepreneurship and increased prospects for economic development," said Chairman of the 100 Black Men of America, Inc., Albert E. Dotson, Jr., Esq.

"As AT&T works with T-Mobile to extend its network to 249 million Americans - roughly 95 percent of the population - we anticipate opportunities arising for minority suppliers, vendors, community partners, and for mobile content and application developers," said Dotson.

"Our communities have increasingly come to rely on mobile connectivity as the primary access point for broadband adoption. And with greater speeds available to more areas at competitive rates, we are encouraged that this deal will foster faster broadband deployment and adoption by people of color, especially those who have been historically underserved," concluded Dotson.

###

141 Auburn Avenue
Atlanta, Georgia 30303

(404) 688-5100

Fax (404) 688-1028

Website: www.100blackmen.org

Mentoring the 100 Way Across A LifetimeSM

May 27, 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Jobs, Economic Growth and the AT&T-T-Mobile Merger

Dear Chairman Genachowski:

We are among the companies that employ and create jobs for thousands of workers who together create a robust hi-tech and technology engine for growth. As we operate in a challenging economic climate, it is vital that federal regulators take a leading role in adopting policies that establish the right incentives to create new jobs and promote economic growth. Nowhere is this more relevant and timely than Washington's oversight of federal telecommunications policy. As the Commissioners know from first-hand experience, jobs and capital investment in the telecommunications industry, especially in the wireless industry, have shown remarkable resilience during the past few years.

In the wireless industry alone, capital expenditures increased 19.4% from 2009 to 2010,ⁱ as carriers continued to upgrade their networks to meet growing consumer demand. Moreover, capital intensity (capex/wireless revenues) is at its highest level since late 2008 as carriers continue deploying advanced 4G LTE networks.ⁱⁱ

Collectively, our companies employ large numbers of Americans in manufacturing, construction and engineering, network infrastructure, IT, software development, and other fields that benefit from a robust communications industry. Our companies have grown in part because current federal policies encourage network infrastructure investment and the rapid deployment of new technologies and because network operators work closely with us to bring new services and products to market as quickly as possible. As a result, our companies can maintain good jobs that sustain multiple communities.

At the same time, we are mindful of the Commission's warnings regarding imminent spectrum exhaust and its potential negative impact on our nation's fragile economy. Our concern for maintaining the vibrancy of America's communications market is what motivates us to write in strong support of the proposed AT&T-T-Mobile merger.

As President Obama has said, all Americans deserve access to the benefits made possible by high-speed Internet services. This includes access to education, healthcare and entertainment. We support the President's goals for this connected future, as contained in both his own statements and the FCC's National Broadband Plan.

Given our nation's size and the federal government's fiscal realities, the best way to fulfill the President's goals is to encourage private investment and deployment of new network technologies. The AT&T-T-Mobile merger offers a clear path to that reality, as AT&T has committed to an incremental \$8B investment to deploy advanced 4G LTEⁱⁱⁱ networks to an additional 55 million Americans once the merger is approved.^{iv} The infrastructure investment required to meet that commitment will produce and sustain jobs throughout the telecommunications industry and improve America's overall economic growth. For businesses such as ours, anything that accelerates deployment of new wireless technologies also means jobs and economic growth can be sustained.

Because AT&T has led the way in wireless innovation, its network is now facing unique challenges from the exponential growth in data traffic it has experienced – up 8,000% from 2007 to 2010.^v Quite simply, capacity constraints would reduce AT&T's ability to deploy and develop innovative services.

Here again, the merger will help move innovation forward. The combination of the networks will quickly provide the functional equivalent of new spectrum to assuage short-term issues associated with impending spectrum exhaust.^{vi} And AT&T's aggressive plans for deployment of LTE will provide greater incentives for all wireless companies to innovate, resulting in a virtuous cycle of innovation.^{vii}

If the Commission decides to approve the AT&T-T-Mobile merger, that vote will not only help fulfill President Obama's pledge to expand access to high-speed broadband, it will also promote economic growth and jobs. While we respect the Commissioners' need to conduct a full review, we believe the economic and technical evidence supporting the merger is overwhelming. Accordingly, we urge a prompt approval of the merger.

Thank you for your consideration.

Sincerely,
Accenture
Acme Packet, Inc.
ACT Teleconferencing, Inc.
A D Technologies
ADTRAN
Advanced Call Center Technologies, LLC
AFL Telecommunications
Alpha Technologies Ltd.
Amdocs
Artel Video Systems
Aspen Marketing Services, Inc.
Avaya, Inc.
BGN Limited
Black Box Network Services
Brocade Communications Systems, Inc.
Canoga Perkins Corporation

Ceragon Networks, Inc.
Check Point Software Technologies, Ltd.
Communications Test Design, Inc.
Compucom Systems, Inc.
Convergys Corporation
D-Link Systems
Dieste
Dimension Data, Americas
Directory Distributing Associates, Inc.
Emerson Network Power
FEI-Zyfer, Inc.
Fujitsu Network Communications, Inc. (FNC)
GENBAND
GENCO ATC
General Dynamics Wireless Services
Global Energy & Technology, Inc.
Good Technology
Hacker Group
Hubbell-Pulsecom
Interactive Digital Solutions
Interbrand
iStreamPlanet Co.
Javelin Marketing Group
JDS Uniphase Corporation
Johnson Controls, Inc.
Madison Group, Inc.
The Marketing Arm
MEC
Metaswitch
NSC Global Limited
Oberther Technologies of America Corp.
OFS
Optelian Access Networks, Inc.
Option NV
Pace Americas
Pantech Wireless, Inc.
Personal Communications Devices, LLC
Research in Motion
Rodgers Townsend
R.R. Donnelley
Schwerdt Design Group, Inc.
ScanSource, Inc.
Securematics
Sedgwick Claims Management Services
Shoretel, Inc.
Sierra Wireless Inc.

SOLUTIONSET
Sonus Networks, Inc.
Star Tek, Inc.
Superior Essex Communications, LP
Sutherland Global Services Inc.
Sykes Enterprises, Incorporated
Symmetricom, Inc.
Synchronoss Technologies, Inc.
TE Connectivity
Tech Mahindra, Limited
Tekelec
Telecom Assistance Group
Tellabs Operations, Inc.
Telmar Network Technology
UltiSat, Inc.
Volt Information Sciences, Inc.
Wipro Technologies
York Telecom Corporation

ⁱ BOA/Merrill Lynch "US Wireless Matrix 2Q10" report issued on August 27, 2010 -- pages 33 and 34

ⁱⁱ BOA/Merrill Lynch "US Wireless Matrix 2Q10" report issued on August 27, 2010 -- pages 33 and 34

ⁱⁱⁱ AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

^{iv} AT&T Public Interest Statement, pg. 1; <http://mobilizeeverything.com/pdfs/PUBLIC-PIS%20FINAL.pdf>

^v <http://mobilizeeverything.com/datavolumes.php>

^{vi} AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

^{vii} AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

**Statement by AFL-CIO President Richard Trumka on Announced Acquisition of T-Mobile USA
by AT&T
March 21, 2011**

Yesterday's announcement of the acquisition of T-Mobile USA by AT&T has important, positive implications for consumers in the U.S. and Germany, for the U.S. telecom workforce and for our country's economic future.

The acquisition ensures AT&T a strong telecom workforce well-positioned to compete globally, while offering tens of thousands of T-Mobile USA employees the opportunity to make their jobs good jobs by benefitting from the pro-worker policies of AT&T, one of the only unionized U.S. wireless companies. AT&T partners with its employees so they have a voice on the job, good living standards, and training and development opportunities to help the company succeed. About 42,000 AT&T mobility employees are represented by the Communications Workers of America (CWA).

For T-Mobile USA workers who want a voice in their workplace, this acquisition can provide a fresh start with T-Mobile management. CWA and ver.di, the largest union in Germany, have partnered to support T-Mobile USA workers in their efforts to come together. The AFL-CIO will continue to work with CWA, ver.di and the global trade union movement to ensure that T-Mobile USA workers transitioning to AT&T will enjoy better employment security and a management record of full neutrality towards union membership and collective bargaining.

The acquisition also promises sorely needed increased broadband speed and build-out in the U.S., particularly rural communities, areas that have been highlighted by President Obama and the Federal Communications Commission as important to bring the U.S. to global parity. In Germany, the deal will allow for greater investment in parent Deutsche Telekom's own fiber network.

Contact: Jennifer Angarita (202) 637-5018

Home About News Legislation Get Involved Events Blog

ADE News Press Releases Articles of Interest

Media

Welcome from ADE Julius Ho

ADE News

« Back to News

ADE EXPRESSES SUPPORT FOR T MOBILE USA AND AT&T MERGER

Posted Mar 22, 2011

ALLIANCE FOR DIGITAL EQUALITY EXPRESSES SUPPORT FOR T MOBILE USA AND AT&T MERGER Organization says merger allows for greater access to affordable broadband and will be key development in efforts to achieve the president's goal of 100% broadband

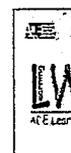
Media Contact: Cynthia Miller, ADE Marketing Officer at cmiller@adeql.org

ATLANTA, GEORGIA, Monday, March 22, 2011 – Shirley Franklin senior advisor for the Alliance for Digital Equality (ADE) and former mayor of Atlanta, issued the following statement today regarding the planned **acquisition of T-Mobile USA by AT&T:**



"Almost one year to the day after the release of the National Broadband Plan, we are able to take a considerable step forward in our efforts to make affordable broadband available to all Americans. This merger gives us the foundation to achieve President Obama's goal of 100 percent broadband and is a positive step toward providing access to unserved and underserved communities around the country.

"The merger of T-Mobile USA and AT&T is a positive step toward providing greater



Get Invo



The Co

- AI
- C
- H
- In

Comm

- Br

access to affordable broadband for consumers and employment security and other workforce benefits for the new joint workforce. Additionally, America’s small businesses will benefit from the expansion of business opportunities from AT&T’s steadfast commitment to supplier diversity. We look forward to seeing the benefits of this merger help bring all Americans into the digital age and we applaud our partner, the Communications Workers of America, for their leadership.”

###

About The Alliance for Digital Equality: The Alliance for Digital Equality (ADE), headquartered in Atlanta, GA, is a nonprofit, nonpartisan consumer advocacy organization that serves to facilitate and ensure equal access to technology in underserved communities. The ADE also serves as a bridge between policymakers and minority individuals in order to help the public understand how legislative and regulatory policies regarding new technologies can impact and empower their daily lives.

ADE’s partner Communications Workers of America (CWA) full statement can be read below.

[Click Here to Read the Article](#)

Share This:



Comments

Post A Comment

Be the First to Leave a Comment. [Click here.](#)

- Lc
 - M
 - Vi
 - Ai
- Corpo
- Bi
 - C
 - R
 - At

About

- About ADE
- Leadership
- Coalition Members
- Learning Without Walls
- Digital Empowerment Councils

News

- En Espanol
- ADE News
- Press Releases
- Articles of Interest

Legislation

- Legislation

Get Involved

- People
- The Community
- Community Leaders
- Corporations
- Newsletter
- Become a Member
- RSS Feeds

Events

- Events

Blog

- Blog
- Blog History

Mer

- Med
- Pho
- Vide
- Rad

Home About News Legislation Get Involved Events Blog

ADE News Press Releases **Articles of Interest**

Media

Welcome from ADE Julius Hol

Articles of Interest

« Back to Articles of Interest

ADE Chairman in "The Hill" - Minority Groups Back AT&T/T-Mobile Merger

Posted Mar 24, 2011

As we continue to "Empower Communities Across the Digital Divide," we are sharing with you an article quoting ADE Chairman Julius Hollis in "The Hill" (3/23/2011.)

Minority groups back AT&T/T-Mobile merger *By Gautham Nagesh - 03/23/11 05:40 PM ET*

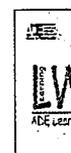


Advocacy groups representing minorities have been voicing their support for AT&T's acquisition of T-Mobile USA from Deutsche Telekom.

The Alliance for Digital Equality, the Hispanic Federation and the National Black Chamber of Commerce were among the groups arguing the merger would benefit minority communities.

But the timing of the statements have led some to question the motivations of the groups. While the Hispanic Federation didn't respond to requests for comment, both ADE and the NBCC acknowledged receiving financial support from AT&T.

ADE chairman and founder Julius Hollis called AT&T a coalition member, or donor, while NBCC president and CEO Harry Alford acknowledged AT&T had funded his organization but said they had recently cut their financial support by 60 percent.



Get Invo



The Co

- AI
- C
- H
- In

Comm

- B



"They cut us 60 percent for some reason," Alford said, noting the NBCC supported Verizon's purchase of MCI and Sprint-Nextel as well.

"We have been consistent in our views of mergers in the telecom industry. We certainly haven't been bought off, let me assure you."

Likewise, Hollis denied having discussed the merger with AT&T or T-Mobile before his organization issued its statement on the merger, noting that doing so would have been a violation of Securities and Exchange Commission rules.

Hollis characterized the acquisition of T-Mobile by one of its competitors as inevitable and positioned AT&T as the most appealing option thanks to its unionized workforce.

He told Hillcon the deal would help bring the goals of the National Broadband Plan to fruition by spreading access to 95 percent of the nation.

"I think this deal is one for the ages," Hollis said. "It create accessible and affordable broadband access to communities that have been under-served. In particular, communities of color."

Alford noted his organization has been consistent in its support over the years for all mergers in the telecom industry, arguing concerns about price increases and innovation haven't been borne out by reality.

"We see it as being a global market...[AT&T/T-Mobile] should benefit businesses and send prices down," Alford said, noting African-Americans disproportionately rely on wireless phones and mobile broadband access to stay connected. "Consolidation is not a concern in this global economy."

The groups' statements also mirror those issued by hundreds of minority advocacy groups and lawmakers in support for Comcast's acquisition of NBC Universal last year. That deal was approved by the government in January over vocal objections from competitors.

Minority Media & Telecom Council president David Honig said his organization has not yet taken a stance on the merger, but expressed irritation at critics who question the motives of minority organizations supporting the merger.

"Give these organizations credit for being intelligent. It doesn't take a long time to analyze things. They aren't corrupt and they weren't paid," Honig said.

"We've seen no examples of reputable organizations that do things because of financial contributions. It's wrong to suggest such things."

Honig pointed out that few question the motives of consumer groups, which lined up in opposition to the merger even more quickly.

- Lc
- M
- Vi
- Al

Corpo.

- Br
- C
- R
- Al

"Organizations would never suggest that those opposing it have gotten paid by Sprint. It debases the debate and doesn't give respect to the dignity, judgment and intelligence of these organizations."

Hollis said his organization released its statement in coordination with the Communications Workers of America, whose ranks include thousands of AT&T employees. He said it was clear AT&T had been the best among wireless firms in terms of "respecting the collective bargaining rights of employees."

"The acquisition ensures AT&T a strong telecom workforce well-positioned to compete globally, while offering tens of thousands of T-Mobile USA employees the opportunity to make their jobs good jobs by benefitting from the pro-worker policies of AT&T, one of the only unionized U.S. wireless companies," said AFL-CIO president Richard Trumka.

A spokeswoman for the CWA said the other potential partner for T-Mobile was Sprint, which uses an incompatible technology so the two networks would be unable to share spectrum.

She also pointed out that AT&T is planning to finance the deal without incurring debt, which she said would leave resources available to expand broadband access.

[Click Here to Read the Article](#)

Share This:



Comments

Post A Comment

Be the First to Leave a Comment. [Click here.](#)

About

About ADE
Leadership
Coalition Members
Learning Without Walls
Digital Empowerment Councils

News

En Espanol
ADE News
Press Releases
Articles of Interest

Get Involved

People
The Community
Community Leaders
Corporations
Newsletter
Become a Member
RSS Feeds



May 31, 2011

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

May 31, 2011

RE: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations (WT Docket No. 11-65)

Dear Chairman Genachowski and Commissioners:

The American Association of People with Disabilities (AAPD) generally supports the merger of AT&T and T-Mobile because this transaction could lead to more people with disabilities benefitting from the accessible phones and services that AT&T provides. As a major carrier, AT&T has taken major steps forward to ensure more accessibility and usability for people with disabilities and AAPD expects this leadership to continue with the new entity.

We believe that when the two companies combine their networks, and when AT&T completes build out of its 4G LTE network, even more people with disabilities will benefit from the greater availability of a faster and more reliable wireless network.

Our understanding is that the new 4G LTE wireless technology that the combined AT&T and T-Mobile entity will deploy to almost the entire nation will provide faster wireless download speeds, and better voice and data quality. These network attributes will enhance the usage of wireless broadband for people with disabilities. For instance: people with visual disabilities rely on high quality sound/audio; people with hearing disabilities need reliable text and data plans; people with cognitive disabilities need high speed/no wait broadband access; and all people with disabilities need wireless availability for public safety and social connectivity.

AT&T has in the past taken up technologies that provide accessibility and usability for people with disabilities, such as Apple I-phones and tablets. We believe the 4G LTE technology could likely lead also to opportunities for more developers to create new and innovative assistive

technologies that could facilitate the independence of people with disabilities. We fully expect the combined AT&T and T-Mobile entity to be part of a wave of innovation in wireless broadband that will facilitate the community of people with disabilities to lead richer and more fulfilling lives through new devices, products and services.

Furthermore, AAPD notes that AT&T has continued to improve and develop its dedicated customer service center since the last merger, with Bell South. This customer service center assists and facilitates people with disabilities when choosing wireless phones, needed accessories, and plans tailored to the individual's particular circumstances and disabilities. AT&T has committed to ensuring that this type of dedicated customer service will extend to T-Mobile's current customer base after the merger. Such targeted customer service goes a long way in further enabling people with disabilities to use wireless services and which often are essential to full participation in everyday life activities.

Based on the benefits to the disability community that we are seeing now, AAPD supports this merger and anticipates similar great benefits resulting from the license transfers.

Sincerely,

Jenifer Simpson

Jenifer Simpson
Senior Director for Government Affairs

American Association of People with Disabilities
1629 K Street NW, Suite 950 • Washington, DC 20006
phone 202-457-0046 (V/TTY) • 800-840-8844 (V/TTY) • fax 202-457-0473 • www.aapd.com



A Union of Professionals

**Statement by Randi Weingarten,
President, American Federation of Teachers,
On the AT&T Merger with T-Mobile**

WASHINGTON—As a union with over a million educators, we are very involved in ensuring that our nation's children are educated for the demands of the 21st century and beyond. One aspect of this is making sure our country, and our schools, have the most up-to-date technology. However, for more than a decade, we have continued to fall behind nearly every other developed economy on broadband speed and build out.

The AT&T acquisition of T-Mobile is a positive step for the expansion of broadband communications networks. At a time when access to high speed broadband defines access to educational opportunities, economic development, job training, health care and government services, far too few Americans have reliable and affordable access. Not only will T-Mobile customers get quick access to the AT&T network, but as part of the merger, AT&T is committed to build out to nearly every part of the United States within four years. This will help close the digital divide, particularly in rural areas. Inner-city students will get increased access to resources. And increasing internet speed, where the U.S. ranks 25th in the world behind countries like Romania, will make it possible to use on-line educational tools wherever one lives.

T-Mobile was searching for a buyer so a merger with one or another company seems inevitable. The alternative to AT&T is Sprint. Sprint has a poor track record when it comes to mergers and acquisitions; for example, Sprint never successfully integrated Nextel. Sprint would also be in a significantly weaker financial position post-acquisition and therefore probably unable to upgrade its technology or engage in a build out. Furthermore, it outsources the majority of its workforce and workers do not have a voice on the job.

AT&T is the only wireless provider that engages in true collaboration with its workforce. We believe that providing workers the opportunity to have a voice on the job is an essential part of human dignity, as well as a fair and sustainable economy. The worldwide labor movement has focused global attention on T-Mobile's bad labor rights history, which will be reversed under an ATT acquisition.

AT&T with T-Mobile can bring real value to our nation's children and to our economy. We will keep a watchful eye and provide our input as this acquisition is thoroughly reviewed.

May 27, 2011

The Honorable Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 11-65

Dear Chairman Genachowski:

The American Foundation for the Blind (AFB) is pleased to submit these comments regarding the merger of AT&T and T-Mobile. We believe that T-Mobile customers with vision loss will benefit from this merger.

AT&T, through its merger with Cingular Wireless, was the first wireless service provider to subsidize access software for consumers with vision loss. This enabled consumers with vision loss to take advantage of innovative wireless communication technology using highly effective specialized software. Unfortunately, T-Mobile customers with vision loss have not experienced that kind of support and assistance from their service provider. AT&T has indicated that it is now preparing a strategy to support full access to phones using the Android operating system by supporting software developed by Code Factory. We are not aware of any such plans by T-Mobile.

AT&T has a strong record of support for and interest in the needs of the disability community. AT&T has established advisory committees (on which AFB has been represented) to gather input and has provided significant staff support for these committees. As a result, AT&T has included the needs and interests of consumers with disabilities in its efforts to bring innovation to telecommunications technology. These efforts have ranged from the support for access software, the introduction of phones meeting the needs of seniors – the Breeze and Ease products – and even such efforts as “smart shoes” communications to monitor compromises in a person’s balance. AFB is hopeful that once the merger is complete, AT&T’s support for persons with disabilities will carry over to existing T-Mobile customers.

We understand that AT&T will be able to significantly expand and improve the 4G LTE network through this merger. This advanced network will enable people with

vision loss to realize improvements in communication and independence through advancements in mobile technologies. Access to a faster, more efficient, and more robust network will, we believe, allow for the introduction of more useful applications for communication and interaction as well as, provision of specialized information and navigation.

In reviewing this proposed merger, AFB urges the FCC to consider AT&T's long and storied history of assisting the disability community, its track record of invention of innovation for the benefit of the disability community, and the unique opportunity AT&T has to expand its reach by merging with T-Mobile.

Sincerely,

Paul W. Schroeder
Vice President, Programs & Policy
American Foundation for the Blind

CC:
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell



STATE OF ARKANSAS
THE ATTORNEY GENERAL
DUSTIN MCDANIEL

May 27, 2011

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

Re: Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations; (WT Proceeding - No. 11-65).

Dear Commissioners:

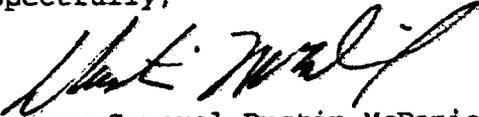
I am writing in support of the proposed merger between AT&T and T-Mobile. Arkansas is a rural state and we want to have the same benefits as more metropolitan areas, especially in the realm of wireless broadband access. This merger holds positive potential for individual consumers, small businesses and rural areas throughout Arkansas.

I also believe the merger would have benefits for Arkansas's law enforcement community. If the current spectrum cannot keep up with the continuous and growing demand of today's digital age, it can put Arkansas's public safety network at risk. During emergency situations, Arkansas law enforcement officers depend on wireless networks that are fast and reliable. As someone who deals with these situations regularly, I am concerned with the availability of these needed services, especially in the rural areas of the state. The proposed merger will hasten the development of rural services, with 97 percent of the country having next-generation high-speed wireless available. Our future success in public safety is reliant on the necessary investments to the network.

Additionally, I ask you to consider seriously any effort to compel AT&T to divest 4G spectrum, especially in Arkansas. The requirement to divest spectrum, as AT&T experienced in a previous merger, did not result in increased competition and more consumer choice. In fact, the result in Arkansas was that many of our cities, large and small, experienced a substantial delay in 3G access. I hope that the FCC will do everything in its power to avoid those issues from arising here.

When making your decision on this issue, I urge you to consider the issues stated above. I anticipate that the Department of Justice and the FCC will offer substantial input prior to approving this merger. Public safety and rural access to adequate spectrum by AT&T customers are concerns that merit substantial weight.

Respectfully,

A handwritten signature in black ink, appearing to read "Dustin McDaniel", written in a cursive style.

Attorney General Dustin McDaniel

CC:

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



BOARD OF DIRECTORS

2011

Executive Committee

Dexter Louie, MD, JD, MPA
Chairperson

Rea Pañares, MHS
Vice Chairperson

Kathy Lim Ko
President/CEO

Debra Nakatomi
Treasurer

Joyce O'Brien, MPH
Secretary

Bill Imada

Janice Louie, RD, BSPH, MA

Victor Kaiwi Pang

Niyanta Spelman

Gayle Tang, MSN, RN

Wilson Wang, MD, MPA, MPH

Headquarters:

450 Sutter Street
Suite 600
San Francisco CA 94108
Main 415-954-9988
Fax 415-954-9999
www.apiahf.org

Washington D.C. Office:

1828 L Street N.W.
Suite 802
Washington, D.C. 20036
Main 202-466-7772
Fax 202-466-6444

*National Advocates for
Asian American,
Native Hawaiian &
Pacific Islander Health*

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

May 23, 2011

Dear Ms. Dortch,

The Asian & Pacific Islander American Health Forum (APIAHF) would like to ask that the enclosed comments be included the WT: 11-65 docket, in support of AT&T's proposed acquisition of T-Mobile.

In terms of health and healthcare, we believe that the acquisition absolutely serves the best interests of Asian American, Native Hawaiians and Pacific Islander communities. In light of the looming spectrum crisis, our communities now, more than ever, see the need to support both the growth and efficient use of spectrum offered by this merger. The continued technological development this would foster is crucial to the advancements in tele-health that many in our communities so desperately depend on.

We are confident that FCC will see the enormous benefits that this acquisition would bring to our communities, and many others like them, and hope that our statement will help illuminate some of the real world issues it would address.

Sincerely,

Kathy Lim Ko
President/Chief Executive Officer

April 15, 2011

BOARD OF DIRECTORS

2011

Executive Committee

Dexter Louie, MD, JD, MPA
Chairperson

Rea Pañares, MHS
Vice Chairperson

Kathy Lim Ko
President/CEO

Debra Nakatomi
Treasurer

Joyce O'Brien, MPH
Secretary

Bill Imada

Janice Louie, RD, BSPH, MA

Victor Kaiwi Pang

Niyanta Spelman

Gayle Tang, MSN, RN

Wilson Wang, MD, MPA, MPH

Headquarters:
450 Sutter Street
Suite 600
San Francisco CA 94108
Main 415-954-9988
Fax 415-954-9999
www.apiahf.org

Washington D.C. Office:
1828 L Street N.W.
Suite 802
Washington, D.C. 20036
Main 202-466-7772
Fax 202-466-6444

*National Advocates for
Asian American,
Native Hawaiian &
Pacific Islander Health*

Statement:

At the Asian & Pacific Islander American Health Forum, we welcome the news pertaining to AT&T's planned acquisition of T-Mobile USA from Deutsche Telekom. We believe that this transaction will be extremely beneficial to the needs and interests of underserved populations, including the Asian and Pacific Islander communities, particularly with respect to health and healthcare. We also do not believe there will be an adverse impact.

We firmly agree with the Obama Administration and the Federal Communications Commission that we can ill-afford to leave anyone behind in the wireless, online and broadband arenas. We also strongly believe in the need for immediate, sustainable, and affordable solutions to deploy wireless broadband in the near term, especially in frontier, rural, and urban inner-city areas where broadband access has continued to be a challenge. The AT&T-T-Mobile transaction will bring advanced 4G technology that supports new, competitive and innovative applications such as tele-health applications to 95 percent of Americans.

As FCC Chairman Julius Genachowski stated in March 2011, the impending wireless and broadband spectrum shortfalls will have a "disproportionate impact on minority and low-income groups who are more likely than the average American to access the Internet through a mobile device." However, by encouraging more efficient use of the wireless spectrum provided by AT&T and T-Mobile, this transaction will help to ensure that every American resident will have access to fast, affordable and reliable service. With access to the newest and latest information, through wireless and broadband technologies, we anticipate a more rapid deployment and adoption of important applications. Included among these, tele-health can improve the health and lives of people who suffer from chronic diseases and those for whom in-person doctor visits can be difficult. Commitments to "last mile" access to broadband for historically excluded communities can significantly improve access to such applications and services, therein improving lives.

The Asian & Pacific Islander American Health Forum welcomes all opportunities for such improvements.

Sincerely,



Kathy Lim Ko
President/Chief Executive Officer

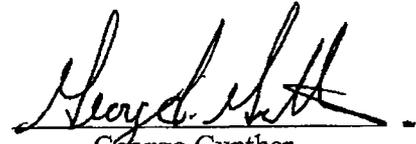
STATEMENT OF GEORGE GUNTHER (ASPLUNDH TREE EXPERT CO.)

1. I am the Chief Information Officer at Asplundh Tree Expert Co. I am responsible for all information technology and communications for the corporation. Asplundh is a family-owned and operated corporation, founded in 1928, with 26 subsidiaries, approximately 28,500 employees, and 35,000 pieces of equipment across the United States and Canada. We provide efficient and innovative line clearance and other vegetation management services to the electric utility industry and other specialized markets such as departments of transportation, municipalities, pipelines and railroads. I joined Asplundh in August 2007 as its CIO and manager of its Information Technology (IT) Department in its headquarters office. I have 25 years of experience in the IT industry, specializing in software businesses and start-ups, and holding CIO and executive-level positions since 1995.
2. We currently use three primary carriers to meet our mobile, that is wireless, telecom needs: AT&T, Verizon and Sprint. We also receive wireless telecom services from approximately 15 other entities. AT&T is our primary provider of AVL (automatic vehicle location) devices used by our truckers, providing about 14,000 such devices. We also have about 500 Verizon AVL devices, which we use due to coverage issues with AT&T. In terms of other handheld devices, Verizon is our primary provider of non-AVL devices, with AT&T second and Sprint third. In total, I would estimate that Sprint provides about 20% of our wireless telecom services, Verizon about 15-20%; and AT&T about 40%, with other companies supplying the remainder. I estimate that our total spending on wireless telecom services is between \$6-8 million annually, with our AT&T spending trending towards \$3 million.
3. All phones used for corporate business, including for communicating to employees or customers, are owned by the corporation through corporate liability (CL) contracts. We also offer our employees discounts through individual liability (IL) agreements. The CL contracts are split equally between AT&T, Sprint, and Verizon. In general, we use an RFP process for big projects, like the AVL system and for our data and voice network. For smaller projects, we negotiate contracts directly with the carriers. In addition, we leverage wireline and wireless services when dealing with AT&T and Verizon. Such leveraging and consolidating services with our three primary carriers has enabled Asplundh to lower its annual telecom costs from approximately \$12 million when I arrived in 2007 to \$6 to \$8 million currently.
4. I believe the market for telecom services is competitive. AT&T and Verizon are, in my view, the viable competitors for business contracts of a large or national scope because of the support they can offer, the national coverage, the variety of services they provide on mobile devices, and cost. I am not that familiar with Sprint's business plan and tend not to trust it. As for T-Mobile, I do not consider it to be a significant competitive alternative to AT&T or Verizon in the business services environment. T-Mobile is consumer-focused, and tends not to market to businesses. It does not offer a breadth of services. Although T-Mobile tries to buy business now and then with interesting cost proposals, it doesn't have the breadth of services or national footprint we need. We operate across the country and need to have nationwide service.

5. I support AT&T's proposed acquisition of T-Mobile. I believe the acquisition would be beneficial to Asplundh and other customers as it would result in better quality service such as fewer dropped calls and faster service. Performance and quality of service are highly important to us, as our employees are out in the field in constant communication with the clients and us, and we need to keep track of them. Currently, AT&T struggles with coverage and quality of service in some areas. In my opinion, AT&T can improve service quality either by buying towers or building them, and buying is less costly, more efficient and improves service faster, especially as both AT&T and T-Mobile use the same technology. Building takes too long. By AT&T buying towers, AT&T customers will have better service in a faster time. The acquisition will also speed up AT&T's implementation of 4G. The wireless telecom industry is changing every day, and such innovation needs to be permitted and encouraged through permitting acquisitions like this one. The proposed acquisition is a good thing, and I do not fear that it will lead to higher prices. I would go to a competitor were AT&T or other wireless telecom suppliers to raise their prices.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge.

Date: 6 / 08 / 2011


George Gunther



May 9, 2011

The Honorable Patrick J. Leahy
United States Senate
433 Russell Senate Office Building
Washington, DC 20510

The Honorable Charles E. Grassley
United States Senate
135 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Leahy and Ranking Member Grassley:

Across the country, more and more Americans are becoming smartphone users, downloading apps for entertainment, banking, health, and more. Despite the impressive amount of devices and apps available, we have only begun to scratch the surface of growth in the mobile applications marketplace. The iPhone and iPad created entire new markets for developers to write programs. The apps marketplace is a \$5.6 billion industry today, and with the introduction of Windows and Android devices it is expected to grow to \$38 billion by 2015.

Our members at Association for Competitive Technology (ACT)—comprised of more than 3,000 small and mid-size information technology firms—know that this growth calls for more wireless spectrum to allow developers to reach as many customers as possible. The AT&T/T-Mobile merger will fill in the gaps of AT&T's phone network, allowing customers in both rural and densely populated areas to receive high quality service, creating efficiencies that will allow for the deployment of advanced 4G LTE technology to more than 97% of the American population. Furthermore, the merger will allow T-Mobile customers access to new products and services available at LTE speeds.

With more customers holding LTE technology in their hands, application developers will be able to deliver better, and more, products to market. Higher speeds and the more efficient use of the companies' existing spectrum will allow developers to create the same type of programs for mobile devices that users are accustomed to working with on their desktops—bringing wired broadband speeds and capabilities to users on the go.

For the members of ACT, and for all applications developers, this merger will expand the marketplace and provide more opportunity for growth.

As the Committee considers the AT&T/T-Mobile merger, we hope you will take into account how this merger may positively impact our growing mobile apps ecosystem, providing the opportunity for more small and mid-size information technology firms to flourish with higher connection speeds and access to more customers on every smartphone platform.

Sincerely,

Morgan Reed
Executive Director

Association for Competitive Technology

CC: Senator Herb Kohl
Senator Dianne Feinstein
Senator Charles E. Schumer
Senator Richard J. Durbin
Senator Sheldon Whitehouse
Senator Amy Klobuchar
Senator Al Franken
Senator Chris Coons
Senator Richard Blumenthal

Senator Orrin G. Hatch
Senator Jon Kyl
Senator Jeff Sessions
Senator Lindsey Graham
Senator John Cornyn
Senator Mike Lee
Senator Tom Coburn

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC**

In the Matter of
Applications of AT&T Inc.
And Deutsche Telekom AG
For Consent to Assign or Transfer
Control of Licenses and
Authorizations

WT Docket No. 11-65

**COMMENTS OF THE
ASSOCIATION FOR COMPETITIVE TECHNOLOGY**

Communications with respect to this document should be sent to:

Morgan Reed
Executive Director
ASSOCIATION FOR COMPETITIVE TECHNOLOGY
1401 K St. NW, Suite 502
Washington, DC 20005
Tel: (202) 331-2130

May 31, 2011

I. SUMMARY AND INTRODUCTION

The Association for Competitive Technology (ACT) hereby submits these comments in response to the Commission's Public Notice (PN), WT Docket No. 11-65.

We agree that it is incumbent upon the Commission to review the applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations. Accordingly, we would like to offer our comments and views on these applications on behalf of our more than 3,000 small and medium-sized software developer members. While there are a number of issues to address in this Public Notice, we believe the Commission must consider the following four issues:

- **Application developers need more spectrum to thrive:** Modern mobile apps show us a mere outline of the kinds of rich multimedia apps developers can produce. In order to make the next wave of apps a reality, developers need more efficient use of spectrum, expanded wireless broadband connections, more reliable wireless broadband, and an expanded consumer base.
- **Spectrum exhaust:** The merger between AT&T and T-Mobile will help alleviate the spectrum shortages already evident in many key markets. Mobile carriers are currently implementing data caps not for increased profits, but to maximize efficient network management in order to ensure service quality for consumers.
- **Expanded wireless broadband connections:** According to AT&T, the merger will directly benefit an additional 55 million Americans, including residents of small towns and rural communities. This represents 55 million new potential mobile app users, and expands the opportunity for mobile apps built in rural communities written to serve rural communities.
- **More reliable wireless broadband connections:** This merger gives the combined company the spectrum necessary to make needed improvements to voice and data quality.

II. ABOUT THE ASSOCIATION FOR COMPETITIVE TECHNOLOGY

ACT is an international advocacy and education organization for developers of software applications and IT services. We represent more than 3,000 small and mid-size information technology firms from around the world and advocate for public policies that help our members leverage their intellectual assets to raise capital, create jobs and innovate.

Our community leaders are not political spokesmen – they are engineers. The workings of the Federal Communications Commission are mostly foreign to software developers—but this Public Notice is a notable exception. ACT draws upon its membership's technical expertise and business concerns to inspire and inform its comments.

ACT was founded by a small group of information technology entrepreneurs who felt their interests were not being represented by government. Today, ACT is still run by entrepreneurs from industry who intimately understand how the regulatory environment affects business decision making and strategy.

III. WIRELESS APPLICATIONS DEPEND ON ADEQUATE SPECTRUM

Many of our members have a particular focus on the market for wireless applications--already a \$5.6 billion industry--that is expected to grow to \$38 billion by 2015. Smartphones, tablet computers, and other mobile devices have spawned this new industry that is poised for exponential growth. And this is a market in which America leads the world in adoption and innovation, with over a quarter million apps for the Apple platform alone. But this market cannot reach its full potential without sufficient spectrum for wireless users.

Because expanded wireless spectrum is critical to our members' ability to reach customers, we write today in support of the AT&T/T-Mobile merger. The merger will provide direct benefits not only to applications developers such as those we represent, but to consumers who will use these apps on their smartphones. Only if the data network is strong can the applications market be strong; as the network grows stronger and more reliable, the apps market will be stronger and more innovative as well.

As described in ACT's letter to Senators Leahy and Grassley of the Senate Judiciary Committee (attached and submitted for the docket), ACT believes that this merger will allow for better utilization of spectrum that is currently assigned to each of the two companies. In that vein, our members believe the merger should be viewed as the first step in the FCC's pursuit of a solution to the looming problem of spectrum scarcity.

Much has been made of the fact that an AT&T/T-Mobile merger would reduce the number of competitors. ACT believes this is a false dichotomy. In a market where resources are scarce, focusing simply on the number of competitors is wrong-headed. The real goal is to create as many competitors as possible that can deliver the level of service demanded by consumers. Those who make this false argument also ignore the decision of T-Mobile's parent company to forgo substantial upgrades to the T-Mobile infrastructure.¹

In simplest terms, Deutsche Telekom's decisions have moved T-Mobile from competitor to speed bump. Deutsche Telekom's decision not to invest in LTE, the next generation broadband architecture that will provide vast improvements in connection speed and network management, means a segment of the population will not see, or will not be able to adequately use, the mobile apps we create -- translating to lost revenue, and lost opportunity to innovate.

For the mobile apps world, the speed difference is simply staggering. Here are the figures reported by a journalist from GigaOm during a recent visit to the AT&T testing lab:

The speeds provided on the download side were about 28.87 Mbps, and were about 10.4 Mbps on the upload side. This compared to speeds of 3.77 on the download side and 1.21 Mbps on the upload for an iPhone capable of maxing out on AT&T's 7.2 Mbps HSPA network. For comparison, Verizon has promised customers speeds of 5-12 Mbps on the download side and speeds of up to 5 Mbps on the upload side.

¹ "T-Mobile's parent Deutsche Telekom is not in a position to finance the necessary large scale investments in the U.S. for T-Mobile to remain competitive." -- T-Mobile CEO Phillip Humm, sworn U.S. Senate testimony, May 11, 2011

The network engineer who ran the test explained AT&T was using MIMO antenna structure and two swaths of spectrum: the 700 MHz it purchased at auction and the AWS band of spectrum it already owns (and wants to purchase more of by buying T-Mobile)²

While there is high demand for mobile applications, there is a risk to the rapid rate of adoption that is occurring. Unlike wired Internet service, wireless service is dependent on spectrum – a scarce resource. Broadband-intensive smartphones account for 25% of all mobile phones and this percentage is rapidly rising. Wireless ISPs cannot simply dig more trenches and pull more fiber to increase speed, quality or bandwidth. AT&T is quickly approaching the limits of its existing spectrum and T-Mobile's spectrum provides a relatively easy and efficient way to expand and improve its data services. Given the importance of the AT&T network to so many of our members, particularly those on the iOS platform, we fully support this merger.

IV. EXPANDED BROADBAND CONNECTIONS HELP APPLICATION DEVELOPERS IN RURAL AREAS

Beyond the immediate benefit of more efficient allocation of spectrum, the merger will bring faster and more reliable connections and better service to millions of users both urban and rural. It puts our members who own businesses in more rural areas on an equal footing with those in more established and larger markets. And it permits smartphones to be true, and mobile, equivalents of the desktops that many workers use today.

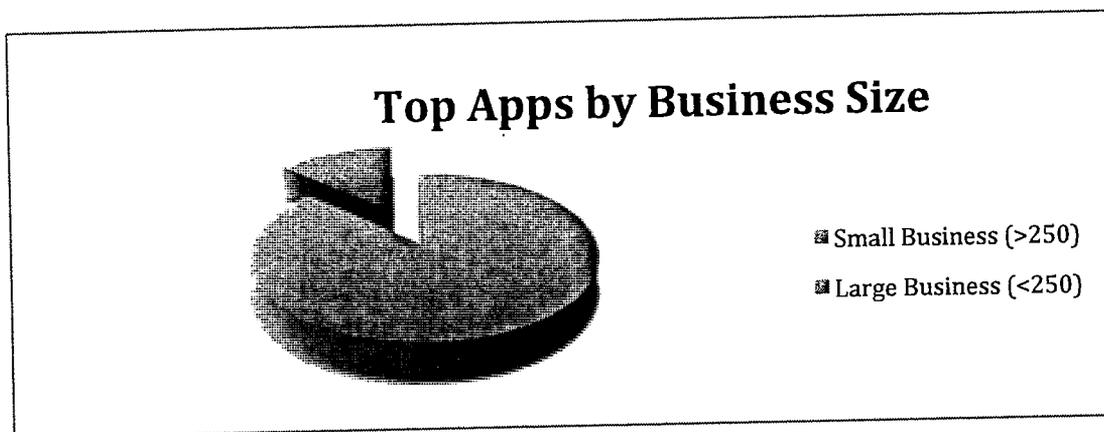
As the Commission knows, it all comes down to density. The United States is so spread out that any nationwide network buildout is problematic; this is one reason why broadband rankings are so low compared to countries like Korea. To make it practicable, a carrier needs lots of spectrum, in lots of places, including rural communities.

Expanding deployment of 4G LTE to more small towns and rural communities creates opportunities for rural users to take advantage of the products and services our member application providers are developing. Entertainment, eHealth, distance learning, mobile banking, and various agri-business applications will be particularly appealing to residents of small towns and rural communities where service has been non-existent or substandard for too long. AT&T plans to use this merger to expand heavily in rural markets, bringing those users up to par with the technology standards to which urban users have grown accustomed.

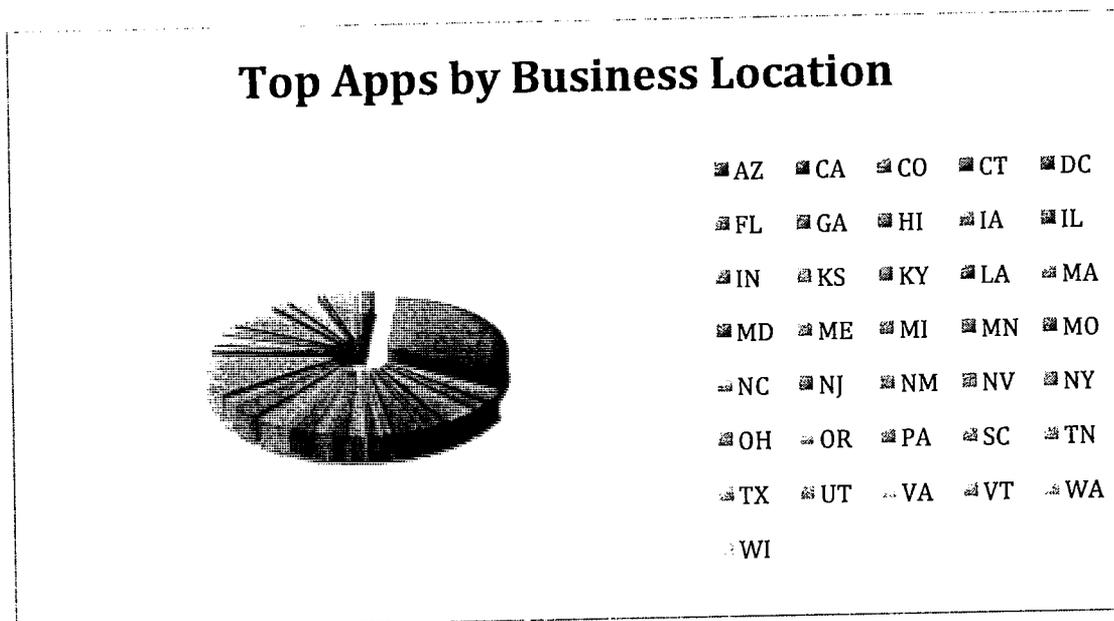
Beyond the benefits to consumers, mobile apps developers will also directly benefit from an increase in rural broadband connectivity. Mobile apps are overwhelmingly created by developers in small businesses, and a surprisingly large number are outside of traditional tech powerhouses in Silicon Valley or New York City. A review of the top 500 best selling applications shows that

² <http://gigaom.com/broadband/a-first-look-at-atts-lte-network/>

over 88% are written by small businesses³; in a majority of cases micro businesses with less than 10 employees.



Second, the growth of the mobile apps industry has led to job creation all across the United States. While California continues to have a large representation of apps developers, nearly 70% of the businesses are located outside of the state of California. This new burgeoning industry allows developers to live almost anywhere, including Moorhead, Minnesota and Tulsa, Oklahoma⁴.



³ ACT analysis of top 500 selling apps, some discrepancies exist due to lack of verifiable employment data and apps created by a developer who has significant investment from a larger company. Some apps branded for a larger company are in fact developed by small firms subcontracted to build the application. Sample size of 408 applications, from "top apps" on March 25 2011

⁴ ACT internal study of top selling apps as of March 25, 2011. ACT members Chalk LLC are in Moorhead, MN; Permafrost Software in Tulsa, OK.

V. THIS MERGER WILL ENABLE APPLICATIONS DEVELOPERS AND THE MOBILE ECONOMY TO THRIVE

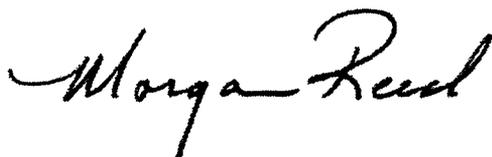
ACT believes that the FCC should approve the merger as part of its long-term solution to the spectrum crisis. Approval of the AT&T/T-Mobile merger is the best immediate step the Commission can take to encourage more efficient and effective use of the currently available wireless spectrum; and it will have tremendous positive effects throughout the mobile apps ecosystem. Our members, the vast majority of whom are small businesses, will be able to reach more customers than ever before as the combined company embarks on its planned bold deployments of 4G LTE technology. If this merger is approved, the combined AT&T and T-Mobile will be able to set a national technological bar that Verizon and Sprint will try to beat. Additionally, wireless application developers will have a solid foundation on which to build new and innovative applications on all smartphone platforms for the benefit of wireless subscribers nationwide.

As we have mentioned in previous filings with the Commission, the Internet has been directly responsible for millions of jobs created, and billions of dollars added to the economy. The next new frontier for job creation comes from the burgeoning mobile sector. The speed at which new users are adopting mobile Internet applications dwarfs all other historical benchmarks. This is a positive for application developers who are selling to an audience with an insatiable appetite. Moreover, the infrastructure build needed to deploy 4G LTE to 55 million additional Americans will require new jobs and investment. It is likely we will see a boom of application developers coming out of places other than Silicon Valley or Boston – maybe Topeka and Sioux Falls will be the new hotbeds of mobile technology.

VI. CONCLUSION: APPROVE THE AT&T AND T-MOBILE MERGER

Application development and mobile IT services are key areas of the U.S. economy. In order to maintain our standing as the world leader in mobile application development the Commission must approve mergers that improve spectrum allocation, expand mobile broadband connections, enable more reliable mobile connections and create conditions where application developers can thrive.

Respectfully Submitted,

A handwritten signature in black ink that reads "Morgan Reed". The signature is written in a cursive, flowing style.

Morgan Reed
Association for Competitive Technology
1401 K Street NW, Suite 502
Washington, DC 20005

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

June 6, 2011

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations

Dear Mr. Chairman,

Today, consumers are increasingly using smart phones, tablets, laptops and other mobile devices to wirelessly connect to the Internet and to each other. We expect access to our content, information and services wherever we are. As a result, consumer demand for wireless broadband is dramatically increasing and our wireless networks are struggling to keep pace with the demand. Given the network capacity challenges, policymakers must give meaningful consideration to AT&T's acquisition of T-Mobile as a means of addressing their near term wireless broadband capacity needs.

Despite the network challenges presented by the surging consumer demand, the United States must continue to lead in wireless broadband technologies. U.S. companies are at the forefront of driving innovations in devices, applications and services and an ever evolving wireless network is essential to realizing new and innovative offerings. An increasingly robust and efficient wireless network is part of a virtuous innovation cycle and a healthy wireless ecosystem is an important part of our global competitiveness.

AT&T's acquisition of T-Mobile represents a near term means of addressing the rising consumer demand. For example, the merged company will be able to leverage a larger network of cell sites allowing greater reuse of spectrum and increasing the wireless broadband capacity of the network. Furthermore, AT&T has indicated that it will migrate the T-Mobile network to LTE technology and offer LTE-based wireless broadband to 97.3 percent of the U.S. population. AT&T has stated that its LTE deployment will bring significant benefits to residents of rural areas and smaller communities, where the benefits of real-time video and similar capabilities are most urgently needed to fill gaps in physical infrastructure for healthcare, education, and other social needs.

The challenge of keeping pace with consumer demand and continuing to lead globally in wireless broadband services and products requires that we tackle the issue on multiple fronts. Many policy related efforts will not be able to quickly address near term capacity needs. The

FCC must seriously weigh the benefits of this merger and approve it. Such action will help to meet the near term wireless broadband needs of consumers and ensure that we are globally competitive as the world increasingly embraces wireless broadband connectivity.

Sincerely,

AVAYA

BROCADE 

facebook

Microsoft®

ORACLE®

QUALCOMM®

IBM

YAHOO!®

CC:

Commissioner Mignon Clyburn

Commissioner Michael Copps

Commissioner Robert McDowell



102 W. Pennsylvania Avenue, Suite 101
Towson, MD 21204-4526
Phone: 410-825-6200 Fax: 410-821-9901
www.baltcountycc.com

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WT Docket 11-65

May 26, 2011

Dear Chairman Genachowski and FCC Commissioners:

The Baltimore County Chamber of Commerce is one of the most influential forces in local government and regional economic development in Maryland. As president and CEO, I hope you will support AT&T's merger with T-Mobile USA. This transaction will benefit the businesses and consumers in my county, and across the country.

The Baltimore County Chamber of Commerce promotes, grows and sustains a diverse and healthy business community that enriches the quality of life and enhances prosperity in the Greater Baltimore region. The wireless industry is constantly evolving, and businesses are always finding new ways to keep connected to their customers. Access to 4G LTE broadband technology opens up a plethora of opportunities for businesses, promotes competition, creates jobs, and contributes to the vitality and strength of our County.

Additionally, access to technology promotes innovation which leads to economic growth and new jobs. Despite the downturn in the economy, the wireless industry continues to invest at record levels. It's important that we have a wireless broadband network that supports the latest innovations. By combining the strengths of these two companies, that goal can be achieved.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Scott', with a long horizontal flourish extending to the right.

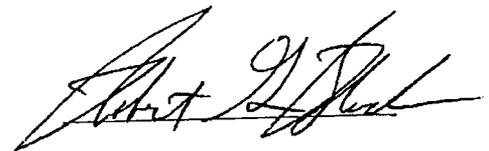
Keith Scott
Baltimore County Chamber of Commerce

Corporate Sponsors

Baltimore Sun Media Group, Bank of America Merrill Lynch, Comcast,
Community College of Baltimore County, Southwest Airlines,
Susquehanna Bank, Wal-Mart of Baltimore County

STATEMENT OF ROBERT BLOCK (CAMERON)

1. I am the IT Manager in charge of Network and Telecoms groups at Cameron International. I have worked in the network/telecom field for approximately 20 years. In my role, I handle the purchase of cellular services, WiFi networks, and wired networks. Our cellular needs consist of cell phones, including smartphones such as the iPhone, Blackberry, and Droid, air cards, and WiFi hotspots. We also have a few pieces of equipment that have cellular modems in them for telemetry; the devices send information back to a central database repository. Cameron, which has about 18,000 employees in over 350 locations worldwide, has annual cellular spend in the United States of approximately \$4-5 million.
2. We purchase cellular services from AT&T, Verizon, Sprint, and T-Mobile. We used to purchase services from ALLTEL; those accounts are now part of AT&T or Verizon. In purchasing services, we issue RFPs and decide which carrier to use based on coverage in a particular region. When determining which carrier to choose, we evaluate both the coverage they provide in our employees' place of employment as well as in their homes. AT&T and Verizon are our preferred providers and accordingly have a substantial part of our business because they have the best networks.
3. We expected that T-Mobile would provide an advantage because they were a global company based out of Germany. In dealing with them, however, we found that there was not much cohesiveness between the different operating units. They were never a serious contender because they were fragmented in the different geographic regions in which they offered service. We could not get one account manager that could handle everything for us. We shifted to AT&T because they had a dedicated business channel for business customers.
4. We last issued an RFP two or three years ago. In that RFP, we looked at AT&T, Verizon, and T-Mobile for international roaming. Prior to the RFP, Cameron used T-Mobile Blackberries, and we expected T-Mobile to provide the best rates. Contrary to our expectations, T-Mobile came in a distant third. Their rates were significantly higher than AT&T and Verizon. After that RFP, we analyzed all of our cellular expenses, and found that T-Mobile had a higher cost per line than the other carriers. Five months ago, we made the decision to eliminate all T-Mobile phones, and moved entirely to AT&T and Verizon.
5. I think that AT&T's acquisition of T-Mobile is about spectrum, and it is a sound business decision. We would be interested in benefitting from improved service quality and expanded 4G LTE coverage that may result from the acquisition. We already made the decision to eliminate T-Mobile from our equation, so we anticipate no impact.



Robert G. Block

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

June 6, 2011

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations

Dear Chairman Genachowski:

As our economy recovers, technology start-ups will help lead the way in creating new jobs and reviving struggling communities. To get off the ground, these growing companies rely on initial financial backing from a small community of venture capital firms. According to the National Venture Capital Association, each year, the venture capital community generates roughly \$3 trillion in revenue, puts more than 12 million people to work, and accounts for more than one-fifth of the total economy.

Many of the fast-growing companies we invest in are technology firms that would benefit greatly from the combination of AT&T and T-Mobile, a merger that will drive job growth, innovation and economic opportunity through a more efficient and robust national wireless network. From the mainframe to the PC to the microchip and the Internet, venture capitalists are an integral part of an economic model that has proven to be successful time and time again.

In our estimation, the greatest opportunity for economic growth involves wireless broadband and mobile devices. But this great growth opportunity faces a major impediment with the looming prospect of "spectrum exhaust": overcrowded networks will be unable to provide the bandwidth required for the exciting new applications and other innovative ideas that are now being developed by tomorrow's successful companies.

We encourage policymakers to continue their efforts to free up the spectrum necessary to enable all network providers to construct next-generation broadband networks. In AT&T's and T-Mobile's merger applications, however, the companies make clear the near-term difficulties that carriers currently face: market-specific capacity issues coupled with longer-term spectrum needs that will delay or prevent the deployment of these next-generation wireless broadband networks.

By combining the physical infrastructure and spectrum positions of the two companies, the merged entity will be able to accomplish what neither firm can do on its own: namely, deploying a 4G LTE broadband infrastructure to more than 97% of the United States population.

That commitment would ensure that millions of Americans throughout the United States will have access to a network that will promote innovative technologies, applications and devices. This foundation will help ensure that venture capitalists and innovators can continue to do what they do best: lead the world in developing new robust applications, software and technology. This merger represents a critical part of the solution to our spectrum crisis in the United States.

Enhancing network capabilities and increasing wireless broadband access to nearly all Americans will unlock previously unimagined entrepreneurial opportunities for countless others who now do not have access to high-speed networks. For the companies we invest in, these new broadband users represent millions of potential new customers and business partners that will help these early-stage companies establish their business – and repeat the proven virtuous economic cycle of start-up financing all over again. We urge the Commission to approve this transaction in order to keep the United States at the forefront of innovation and technology.

Thank you for your consideration.

Jon Auerbach
Charles River Ventures

Will Griffith
Technology Crossover Ventures

Tim Barrows
Matrix Partners

Promod Haque
Norwest Venture Partners

Kevin Compton
Radar Partners

Stratton Sclavos
Radar Partners

Daniel Deeney
New Venture Partners

Jake Seid
Lightspeed Ventures

CC:

Commissioner Meredith Attwell Baker

Commissioner Mignon Clyburn

Commissioner Michael Copps

Commissioner Robert McDowell



City of Placerville
Office of The Chief of Police
“Partners with the Community”

George Nielsen
Chief of Police
May 25, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Chairman Genachowski and Commissioners:

As the Placerville Police Chief, I am dedicated to protecting the public. Technology has been a great tool to help keep our residents safe. The importance of mobile broadband coverage is essential to today's first responders. A cell phone can be a life saving tool in a time of need and it is critical that these life and death calls are not dropped.

Not only is a mobile network helpful to the country's citizens, it is extremely beneficial to the police officers dedicated to protect the residents of Placerville. Gaps in coverage can greatly impact communication between police officers and outside medical emergency responders. The proposed merger of T-Mobile and AT&T, WT Docket Number 11-65, will expand LTE coverage which will greatly help us -- especially in emergency situations.

I ask the Commission to consider the improved public safety that could result from this acquisition. I understand and respect that a review must be conducted, but I am anxious to start utilizing the public safety benefits from this merger.

Sincerely,

George Nielsen
Chief of Police, City of Placerville

CC:
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Meredith Attwell Baker



Karen J. See, President, Coalition of Labor Union Women

The Coalition of Labor Union Women is a National Organization representing women from 60 different unions with chapters in 21 states. We are empowering working women to become leaders in their unions and encouraging them to make a difference on the job and, most importantly, in their own lives. We were very pleased to hear the recent announcement of the acquisition of T-Mobile USA by AT&T.

We believe that giving employees a voice on the job is essential. AT&T is the only wireless provider that has a fully unionized workforce. Many of their workers are women. Having a "union" job provides them with access to better wage protection and benefits which are so important to women many of whom are the only source of income for their family.

Access to high speed broadband will provide women with better educational opportunities, job training, economic development, and health care and government services. We believe this merger will improve the lives of women and their families.

ORAL TESTIMONY OF LARRY COHEN
PRESIDENT
COMMUNICATIONS WORKERS OF AMERICA

“The AT&T/T-Mobile Merger”

Before the Senate Committee on the Judiciary,
Subcommittee on Antitrust, Competition Policy, and Consumer Rights

May 11, 2011

Good morning, Chairman Kohl, Ranking Member Lee, and Members of the Subcommittee. I am Larry Cohen, President of the Communications Workers of America (CWA). CWA represents 700,000 workers, including 43,000 AT&T wireless employees. I appreciate the opportunity to share our views with you today.

We look forward to a thorough review of this transaction by the FCC and Department of Justice. We also appreciate the role of Congress and this Subcommittee in monitoring the wireless market and this merger. At the end of these inquiries, we believe that three points will become apparent: (1) the AT&T/T-Mobile merger will accelerate high-speed broadband deployment; (2) the transaction will positively impact consumers; and (3) the merger will benefit workers. Therefore, we believe the merger should be approved with appropriate conditions to achieve those goals.

Four years ago, CWA launched our Speed Matters campaign to highlight the importance of high-speed broadband for our nation's future. High-speed Internet is essential to economic competitiveness, job creation, and our quality of life. Telemedicine, distance learning, and smart grids have enormous potential, but they will remain beyond the grasp of tens of millions of Americans unless we are able to accelerate the development of truly high-speed wired and wireless broadband networks. Unfortunately, the United States has fallen behind 25 other countries – including Romania – in the capacity of our broadband networks.

The AT&T/T-Mobile merger will help us re-establish global leadership in high-speed communications. As a result of the transaction, AT&T promises to deploy next-generation wireless service to over 97 percent of our nation's population within six years. This is noteworthy because today only 20 percent of U.S. broadband subscribers connect to the Internet at such speeds. The effects of this merger will be especially significant for rural Americans, many of whom are on the wrong side of the digital divide. In order to create sustainable communities, we must ensure that rural areas have access to high-speed broadband. Government can, and should, confirm broadband and speed commitments as well as establish concrete timetables for deployments.

The real question this transaction poses is not whether T-Mobile will survive as an independent competitor, but whether Sprint or AT&T will acquire T-Mobile. Deutsche Telekom has made it clear that it would no longer make the investments necessary to increase speeds on their network.

The record clearly indicates that an AT&T/T-Mobile merger will be better for consumers and competition than a T-Mobile/Sprint combination. AT&T has the financial resources to develop fully T-Mobile's assets. Sprint, with its BB minus non-investment grade bond rating, does not. AT&T and T-Mobile utilize similar and compatible technologies. Sprint does not.

Finally, the AT&T/T-Mobile merger will be good for U.S. workers. Past experience in major wireless mergers indicates that employee issues can be managed through careful planning and by returning overseas work to this country. This integration will benefit both AT&T and T-Mobile workers. In the

long-term, the expansion of AT&T's 4G LTE network holds the potential to create thousands of new jobs.

Sprint, on the other hand, is the only U.S. wireless company that outsources network management, and according to press reports, many of those jobs have been sent to India. Sprint also outsourced a significant percentage of its customer contact work to places like the Philippines, India, and Mexico. And lastly, Sprint has a long history of hostility to employees who want to join a union.

In summary, CWA believes that AT&T's acquisition of T-Mobile is a win-win proposition. It will accelerate broadband deployment, benefit consumers, and positively impact workers. This is why we hope and expect that, following a thorough regulatory review, the Department of Justice and the FCC will approve AT&T's acquisition of T-Mobile with the conditions enumerated above.



100 MULBERRY STREET, SUITE 601
MAGON, GEORGIA 31201
PH (478) 254-5200
FAX (478) 254-5239
WWW.CHWG.ORG

May 18, 2011

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

RE: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations; (WT Proceeding—No. 11-65).

Dear Commissioners:

I am the president and CEO of Community Health Works, which has the mission of regional integration of "whole-person healthcare" for the uninsured in middle Georgia. Through my years of experience in this field, I have come to appreciate how important it is to keep health care costs low while still providing the level of care that is needed. In many cases, that means engaging specialists, which is inconvenient for patients who are not in urban areas and may not even be able to afford the transportation to get there.

We can overcome this problem by connecting specialists with general practitioners in our area via video, voice and data connections. Not only can physicians and other health care professionals consult, but they can share test results and even video appointments with patients. The proposed merger between AT&T and T-Mobile will greatly help make these connections by delivering ultra-fast wireless access to all parts of our state.

People who have become accustomed to having high-speed Internet service may not be sensitive to the fact that it is not even available in some parts of Georgia. While it may not be economically viable for companies to connect every household through wired service, wireless provides anyone in reach of the signal the opportunity to access it. We are fortunate that AT&T is willing to make the investment needed to deliver next-generation service to a vast majority of the American population.

I hope you share with me the excitement about the possibilities that the next generation of high-speed wireless service and the impact that it can have on health care.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Dent', is written over the word 'Sincerely,'.

Gregory J. Dent
President and CEO

CC:
Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell

Rep. Shuler Statement on Announced Merger of AT&T and T-Mobile

March 23, 2011 2:09 PM

Washington, DC – U.S. Representative Heath Shuler released the following statement today regarding the proposed acquisition of T-Mobile USA by AT&T from Deutsche Telekom.

"Last year the Federal Communication Commission, at Congress's direction, released a National Broadband Plan aimed at providing access to broadband Internet to virtually every American. The President has echoed that call as well. The proposed merger of AT&T and T-Mobile, coupled with AT&T's commitment to expanding their network coverage, is a tremendous step toward achieving those goals, and achieves them rightly through the private sector, saving taxpayer money."

"As the Representative of a largely rural and mountainous district, I am very pleased to learn of this proposed acquisition. With AT&T's commitment to reach 95 percent of America's population, more than 294 million people, with its 4G LTE, this merger will result in expanded and improved broadband Internet and mobile phone services for thousands of residents in Western North Carolina and millions of people across the country."

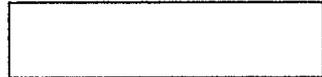
"As railroads and highways connected previously remote areas of America to the larger world in previous eras and spurred growth, access to high-speed and reliable Internet and mobile phone service is a necessity for 21st Century business development and job creation. Currently, too many homes and small businesses in Western North Carolina, and rural communities across the country, lack the access they need. I believe this deal will help close that digital divide, allowing for the growth of small business and job creation no matter where a community is on a map."

###

Related Media Items

- Shuler: Revive fiscal commission plan for up-or-down vote
- Who's who in the fight to reduce the deficit
- Shuler: Congress pointing fingers as nation struggles
- Rep. Shuler Statement on Announced Merger of AT&T and T-Mobile
- Rep. Shuler Opposes Effort to Defund National Public Radio
- Rep. Shuler Statement on Vote to Bring U.S. Troops Home from Afghanistan
- Rep. Shuler Introduces Legislation to Spur Job Creation, Revitalize American Manufacturing
- Rep. Shuler Statement on the President's Proposed Budget for FY 2012

Share this Page



National Debt Clock

As of now:
\$14,345,297,228,678

Sign Up for our Newsletter

Enter your email

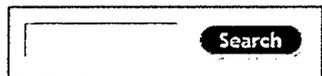


Stay Connected



Search a Bill

By Keywords: By Bill Number:



Washington D.C. Office

229 Cannon House Office Bldg.
Washington, DC, 20515
Phone: (202) 225-6401
Fax: (202) 226-6422

Asheville Office

205 College Street, Suite 100
Asheville, NC, 28801
Phone: (828) 252-1651
Fax: (828) 252-8734

Murphy Office

75 Peachtree St., Suite 100
Murphy, NC, 28906
Phone: (828) 835-4981

Sylva Office

125 Bonnie Lane
Sylva, NC, 28779
Phone: (828) 586-1962 x223

Copyright © 2011 Office of Congressman Heath Shuler

[Contact](#) | [Newsletter Sign Up](#)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**Proposed Transfer of Control of T-Mobile USA, Inc. to AT&T Inc.:
WT Docket No.11-65**

**COMMENTS
Submitted on behalf of Consumer Policy Solutions
(and the Consumer Awareness Project)
Debra Berlyn
President**

May 25, 2011

Introduction

As President of Consumer Policy Solutions and director of the Consumer Awareness Project, I appreciate the opportunity to offer these comments to the Federal Communications Commission (“Commission”) in the matter of the proposed transfer of control of T-Mobile USA, Inc. to AT&T Inc.:

As the FCC evaluates the proposed AT&T merger with T-Mobile, it will likely consider multiple areas that impact consumers. As a long-time advocate of a diverse consumer interest in the communications marketplace, I urge you to consider the benefits this merger will bring in multiple areas, particularly the following three benefits these comments will highlight:

- 1) Expanded 4G-LTE broadband services.
- 2) Access to advanced services for healthcare, education, and special needs.
- 3) Online privacy and data security.

Discussion

The Commission should consider the following consumer benefits of the proposed mergers:

1) Expanded 4G-LTE broadband services.

For the millions of Americans without access to true high-speed Internet service, particularly those living in rural areas, the proposed merger will bring the next generation of 4G LTE broadband services. As it is likely known, T-Mobile’s parent

company, Deutsche Telekom, did not have definitive plans to deploy 4G/LTE or 4G/WiMAX here in the U.S. AT&T is already moving forward on a 4G/LTE deployment and has committed *an additional \$8 billion in investment if the merger is approved.*

Through the proposed acquisition and AT&T's deployment of 4G LTE, coverage will extend to an additional 55 million Americans and reach more than 1 million additional square miles beyond the company's current plans – ultimately connecting 97% of Americans. Most importantly, these plans will bring the benefits of LTE technology, including faster speeds and reliable performance, to more people in rural communities and those with little or no access to broadband.

As indicated in the FCC's latest Broadband Report to Congress, approximately 26 million Americans, mostly located in rural communities across the U.S., do not have access to broadband. AT&T's deployment of 4G LTE technology will help bring broadband access to these consumers.

2) Access to advanced services for healthcare, education and special needs.

The benefits for Internet users – especially those without access to wired broadband connections – will be substantial. The ubiquity of the wireless Internet brings with it so many benefits: healthcare access, education, instant communication. For consumers, 4G access is a route to better, more productive lives.

A greater number of consumers will also be able to realize the benefits of telehealth and online learning through the deployment of 4G technology. Faster broadband access will enable consumers to connect remotely with their physicians and find additional benefits for better medical care. Virtual and online learning opportunities for school age children will also increase – especially in rural and other small communities across the U.S.

Additionally, those with special needs will be able to explore broadband in ways that benefit them the most – more quickly and easily with 4G LTE technology.

3) Online Privacy and Data Security.

Online privacy and data security is an important consumer issue and a concern that can be addressed in the context of this merger. AT&T has taken a lead role in educating consumers about guarding their online privacy. Before the rest of the industry, it adopted standards for transparency and control of personal data. As more of our daily lives are conducted online, privacy protection is increasingly important and AT&T has set a good standard in this area.

Keeping up with the latest security protection for the Internet and smart phones is a moving target and it is critical for the protection of consumers.

Consumer Policy Solutions, through its Consumer Awareness Project, has been working to help educate and inform consumers about the necessary steps to keep themselves secure in the digital world. Wireless providers such as AT&T have been industry leaders when it comes to security issues for consumers. AT&T has worked diligently with consumers, members of the industry, government agencies and non-profit organizations to communicate simple steps consumers can take to protect themselves online. The joint resources of the merged company will help promote a safer, more secure network for consumers.

This merger provides an opportunity to provide a more integrated approach to online security and I urge the Commission to recognize this as an important value of the merger for consumers.

Conclusion

For all these reasons, I encourage the Commission to approve the T-Mobile/AT&T merger.

Thank you for the opportunity to offer these comments. I look forward to working with the Commission on this issue.

May 31, 2011

VIA ELECTRONIC FILING

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

Re: *Applications of AT&T Inc. and Deutsche Telecom AG for Consent to Assign or Transfer Control of Licenses and Authorizations, WT Docket No. 11-65*

Dear Ms. Dortch:

I am writing to explain how the proposed merger between AT&T and T-Mobile USA could affect Corning Incorporated, the inventor of the first low-loss optical fiber for telecommunications, and America's telecommunications stature.

Corning is the global leader in specialty glass and ceramics. Drawing on more than 160 years of materials science and processing engineering knowledge, Corning is able to create and manufacture keystone components that enable high technology systems for telecommunications, consumer electronics, mobile source emissions control, and life sciences.

The key to Corning's longevity has been its long-term commitment to innovation. We consistently invest 10 percent of our revenue in research, development, and engineering. Because of this commitment, we have invented numerous products and processes over our history that have had a profound effect on our Nation's economy. The invention of optical fiber and the manufacturing process for making it represents one of Corning's many breakthrough inventions.

It is certainly not obvious why the world's largest manufacturer of optical fiber and cable would take a keen interest in the FCC's consideration of the proposed merger. But, the fact is, wireless and optical fiber technology are complementary. Wireless demand drives fiber demand.

Wireless demand is growing at a phenomenal rate. Mobile broadband data traffic is growing at a 92 percent compound annual growth rate¹ as consumers have flocked to smartphones and tablet computers to reap the many benefits of such devices. Smartphone devices alone generate 24 times the mobile data traffic as conventional wireless phones. And, as AT&T notes, its own mobile data volumes have surged by 8,000% between 2007 and 2010.²

The growth rate in wireless demand will likely accelerate as 4G wireless networks are fully deployed. 4G technology, like Long Term Evolution (LTE), enable broadband connections at

¹ CISCO Visual Networking Index Report, Global Mobile Data Traffic Forecast Update, 2010-2015, Figure 1 (Feb. 1, 2011).

² Acquisition of T-Mobile USA, Inc. by AT&T Inc., Description of Transaction, Public Interest Showing and Related Demonstrations, at 22, ULS File No. 0004669383 (filed Apr. 21, 2011).

speeds of 10Mbps per user or more within a cell site³, a transmission rate that exceeds the average broadband speeds used by residential subscribers today.

The growth in wireless demand drives the demand for optical fiber in two notable ways. *First*, to accommodate the growth, wireless carriers shift traffic to their fixed wireline network as quickly as possible. *Second*, wireless carriers need to upgrade their backhaul network to fiber optic transmission as the capability of copper transmission, typically in the form of one or more T-1 lines, is not sufficient to manage the backhaul traffic.

Fiber optic cable is also being deployed at the cell sites all the way to the remote radio head at the top of cell towers, a technology referred to as Fiber-to-the-Antenna (FTTA). The large coaxial cables currently installed on cell towers have inherent bandwidth limitations. They are also inefficient in power usage and create wind and weight loads on towers that are becoming a concern as more antennas are installed to meet the growing mobile bandwidth demand. Fiber optic cable is also increasingly being used for Indoor Distributed Antenna Systems (IDAS) to expand wireless coverage and improve reliability inside buildings. Corning has unique technology solutions for both FTTA and IDAS.

In light of the connection between the demand for wireless and the demand for fiber, Corning supports public and private initiatives that accommodate spectrum efficiency, increase spectrum availability, increase infrastructure investment, and expand broadband access to more Americans. The proposed merger will achieve three of these goals.

First, the merger would, in the short term, relieve the current mobile broadband spectrum shortage. As Chairman Genachowski recognized, “[the] explosion in demand for spectrum is putting strain on the limited supply available for mobile broadband, leading to a spectrum crunch If we do nothing in the face of the looming spectrum crunch, many consumers will face higher prices ... and frustrating service.”⁴

Although the merger would not literally increase spectrum supply, it would increase spectrum efficiency to a point that would provide a short term solution to the capacity constraints of both AT&T and T-Mobile. Because both companies share common technologies, integration of their networks will create additional capacity that will allow the combined company to improve service quality and free up spectrum for more spectrally efficient LTE technology.

Second, the merger would result in a significant increase in infrastructure investment that would not otherwise be made. AT&T’s current spectrum holdings and T-Mobile’s capital constraints would not allow either company, acting alone, to deploy a nationwide LTE network.

³ IDATE Consulting and Research (www.idate-research.com) reported in their “2011 LTE Facts & Figures, Markets & Trends,” LTE Watch Service, that Verizon Wireless’ LTE launch in December 2010 provides an average speed of 5-12 Mb/s downlink and 2-5 Mb/s uplink in the 700 MHz range (2x10 MHz) with peak download rates of 40-50 Mb/s demonstrated. And Japan’s NTT provides a maximum speed of 37.5 Mb/s downlink and 12.5 Mb/s uplink in the 2.1 GHz range (with some building capacity of 70 Mb/s downlink and 37.5 Mb/s uplink).

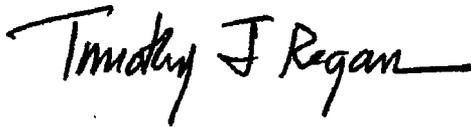
⁴ *Prepared Remarks of FCC Chairman Julius Genachowski*, CTIA Wireless 2011 (Mar. 22, 2011), available at http://www.fcc.gov/Daily_Releases/Daily_Business/2011/db0322/DOC-305309A1.pdf.

AT&T has stated publicly that it would invest \$8 billion beyond its current investment plan to upgrade the combined network to LTE if the merger is approved.⁵

And Third, the merger would help to achieve the President's goal of "connecting every part of America to the digital age."⁶ The merger would give the combined company the scale, resources, and spectrum needed to deploy LTE to more than 97 percent of Americans, rather than 80 percent under AT&T's current plans. Nationwide LTE deployment would bring significant benefits to residents of rural areas and smaller communities in which mobile broadband could bring educational, healthcare and other benefits. For instance, LTE's low latency rate provides support for delay-sensitive online applications like long distance learning or remote patient examinations by doctors in other locations.

We realize that the Commission must do a rigorous analysis of the impact of the proposed merger on a number of factors beyond those cited in this letter. But, we urge the Commission to give great weight to the public benefits cited herein: improved spectrum use and efficiency, increased infrastructure investment, and expanded broadband access to areas that would not otherwise be served. These benefits give the FCC reason to look favorably on the merger.

Respectfully submitted,

Handwritten signature of Timothy J. Regan in black ink.

⁵ See AT&T to Acquire T-Mobile USA from Deutsche Telekom, AT&T News Release at 3 (Mar. 20, 2011) (stating that AT&T will invest \$8 billion over seven years), available at <http://www.att.com/gen/press-room?pid=19358&cdvn=news&newsarticleid=31703&mapcode=corporate|financial>.

⁶ President Barack Obama, State of the Union Address, (Jan. 25, 2011), available at <http://www.whitehouse.gov/the-press-office/2011/01/25/remarks-president-state-union-address>.



NURTURING
HISPANIC
COMMUNITIES

May 17, 2011

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 11-65

Dear Chairman Genachowski and Commissioners:

The Cuban American National Council (CNC) would like to express its optimism about the potential benefits of the proposed merger of AT&T and T-Mobile which would in essence provide faster broadband connections to more Americans and more communities around the country than what we have today.

As a non-profit organization that serves low-income communities in need from all racial and ethnic groups, CNC understands the value that this life-changing technology can bring to our work. CNC assists individuals to become self-reliant and builds bridges among America's diverse communities and as such, this merger can potentially give us a cheaper, faster, and more efficient way to deliver our services.

AT&T has long had a reputation of being a committed partner and a responsible corporate citizen to the Latino community. CNC has seen this first hand in Florida and in the other states in which we operate. We believe that trend will only continue and strengthen as the company brings T-Mobile into its corporate citizenship philosophy, its commitment to supplier diversity, and adds T-Mobile workforce to the biggest corporate unionized workforce.

In addition, AT&T has proven time and again, it has a rock-solid commitment to the Latino community. In many of the areas in which companies are judged, AT&T is among the leaders, including in its hiring of Latinos across the ranks of the company, the inclusion of Latinos at the highest levels of operation (the President and CEO of Mobility and Consumer Markets is our good friend Ralph de la Vega), and its use of Latino suppliers. AT&T has also converted nearly 700 of its U.S. stores to bilingual locations where Spanish-dominant customers can interact with salespeople who understand their needs and language. The company also has substantially increased their reach of Spanish-language customers by deploying a full service Spanish language website.

GMD--Corr--FCC--Genachowski--110517

Federal Communications Commission

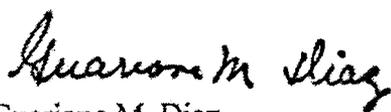
Page 2

May 17, 2011

From all the information we have seen, it seems evident that the post-merger AT&T will offer mobile broadband to more people in more communities than ever before, utilizing the most modern 4G LTE wireless technology. This wireless technology will enable consumers to use wireless broadband speeds to gain access to job creating opportunities, job training opportunities, opportunities to start their own businesses, opportunities to further their education, opportunities to monitor and improve their health, and even simply, to stay more connected to their loved ones in other states or who may live in another country. The benefits of this merger to the consumer, especially Latinos, are incredibly significant and would go a long way to erase the digital divide.

CNC is confident that AT&T's industry leading technology and best practices will continue after the merger with T-Mobile. For this reason and all the others expressed in this letter, we hope the FCC will consider these tremendous benefits, ones that are sorely needed in our communities, as you review this merger in full.

Sincerely,



Guarione M. Diaz
President and CEO



Chairman Julius Genachowski

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 11-65

May 31, 2011

Dear Chairman Genachowski:

The Dominican American National Foundation (DANF) is non-profit organization founded in 1989 in response to the emergency advocacy needs surrounding a group of Dominicans who were detained at Krome Detention Center for deportation. The founding members worked toward releasing this group of individuals and in so doing, discovered the need for a strong Dominican-American voice in local, regional and national affairs.

While DANF's roots are in Miami Dade-County, Florida, the organization has grown to represent Dominicans also living in New York, Rhode Island, Massachusetts and in growing numbers across all fifty states and in Puerto Rico. With such a broad and diverse constituency across the United States, DANF feels it is uniquely positioned to provide comments on the AT&T-T-Mobile merger.

The AT&T-T-Mobile merger will mean that many more Dominicans nationwide will gain access to 4G LTE wireless service and begin embracing all the added benefits that this state-of-the-art service has to offer. AT&T and T-Mobile customers will also begin to enjoy better voice and data quality because of the efficiencies gained through consolidation of the two companies' compatible networks. This improved service quality will enable Dominicans to engage in online education, job training, and mobile commerce all from their handheld phones.

Dominican American National Foundation

2885 NW 36 Street • Miami, Florida 33142 • Tel: 305.637.8337 • Fax: 305.637.9474



This merger is also consistent with one of the primary aims of DANF: computer training. While our computer training courses have been useful over the years, we are now seeing a strong migration toward handheld phones and other mobile devices. With the completion of the merger more Dominicans will be able to participate in training sessions without tethering themselves to a desktop computer. DANF is confident that, with the advent and wide availability of 4G LTE, we will begin seeing more Dominicans using handheld phones to complete some of the more complex computing tasks.

DANF strongly believes that the merger of AT&T and T-Mobile will help elevate Dominicans across the nation as they strive to better themselves and participate in educational, civic and business activities. DANF looks forward to the swift completion of this merger so the people we represent may gain access to all the opportunities available from 4G LTE wireless coverage.

Sincerely,

Manuel Matos, esq.

Chairman, Dominican American National Foundation, Inc.

(founded 1989)

CC:

Commissioner Meredith Attwell Baker

Commissioner Mignon Clyburn

Commissioner Michael J. Copps



Policy Memorandum

ECONOMIC POLICY INSTITUTE • MAY 31, 2011 • POLICY MEMORANDUM #185

THE JOBS IMPACT OF TELECOM INVESTMENT

BY ETHAN POLLACK

This memo describes the jobs impact of a prototypical investment in wireless infrastructure.

The jobs estimate includes both direct jobs within the primary industries that meet the additional demand for goods and services and supplier jobs in the secondary industries that provide those primary industries with intermediate goods and services. Additionally, the estimate also includes “induced jobs” created as incomes earned by newly hired workers are spent back into the economy.

Our findings are based on the following process:

First, we used the Employment Requirements Matrix (ERM) from the Bureau of Labor Statistics (BLS) to translate a given amount of investment spending into the number of directly supported jobs in the primary industries that see final demand for their output rise as a result of the new investment. The ERM also allows an estimate of supplier jobs supported in the industries that supply the primary industries. For example, the construction industry (a primary industry) is a purchaser of commodities such as cement, steel, and heavy equipment as well as services such as accounting and legal assistance. These industries will need to expand to supply the construction industry when it expands. See **Table 1** for how we allocated the likely wireless investments across primary industries—this allocation is the input we use for the employment requirements matrix.

Second, we use a macroeconomic multiplier for infrastructure investment of 1.5 to calculate the economic activity that is induced when income earned by newly hired workers and firms is re-spent throughout the economy. From this re-spending estimate we can then estimate the number of jobs associated with the new economic activity. Essentially, as construction workers are hired to help build the wireless infrastructure, they will have more money to spend. If they buy lunch at a neighborhood diner, this will support jobs for wait-staff. If the newly hired waiters and waitresses then buy clothes for their kids, this will support jobs in retail establishments.

A macroeconomic multiplier of 1.5 is consistent with a range of independent estimates of the net macroeconomic effects of government investments in infrastructure—including those supplied by the Congressional Budget Office and Moody’s Economy.com. This multiplier includes an implied “re-spending” multiplier of 0.5, which is consistent with estimates of private-sector re-spending surveyed by Bivens (2006). This multiplier is applied to the amount of upfront spending to calculate the total amount of new economic activity generated by the upfront spending. We then use the historical relationship that prevails between GDP growth and employment growth to infer that each 1% increase in GDP corresponds to 1.2 million new jobs. This relationship between GDP growth and employment growth is also relatively constant across many macroeconomic forecasters (see CBO 2011 for the latest example).

TABLE 1

Job model input for \$1 billion investment in wireless network infrastructure

Sector code	Sector description	Allocation	Investment (\$millions)
79	Communications equipment manufacturing	50%	\$500
110	Warehousing and storage	5	50
115	Telecommunications	25	250
125	Commercial and industrial machinery and equipment rental and leasing	5	50
129	Architectural, engineering, and related services	7.5	75
166	Electronic and precision equipment repair and maintenance	7.5	75
	Total	100%	\$1,000

SOURCE: Author's analysis.

Third, we add the numbers of direct, supplier, and induced jobs derived from the above calculations to estimate the total number of jobs supported by this spending.

Fourth, we use the information from the macroeconomic multiplier and employment requirements matrix to estimate the number of jobs supported directly by the first-round of spending (i.e., in both direct "receiving" industries as well as in indirect "supplier" industries). We know that two-thirds (i.e., 1/1.5) of the total jobs are created or retained by the first round of spending. The employment requirements matrix then allows us to apportion this two-thirds of total jobs into the appropriate direct versus supplier industry splits.

Fifth, we estimate the jobs that are induced through re-spending of income by using the macroeconomic multiplier that tells us that the remaining one-third of jobs (i.e., 0.5/1.5) are jobs that are induced through re-spending.

Using this methodology, we find that \$1 billion invested in a year would create approximately 12,000 jobs in that year; or, alternatively, that a \$1 billion investment would create 12,000 job-years' worth of employment. This includes 3,500 direct jobs, 4,500 supplier jobs, and 4,000 induced jobs. Note that the estimates are in "job-years," which refer to a job held for a single year; for example, five jobs performed for a single year is the equivalent to one job retained for five years. This figure also assumes an economy that is operating below full potential, with elevated levels of unemployment.

Note on AT&T and T-Mobile

AT&T recently reached an agreement to purchase T-Mobile from its parent company, Deutsche Telekom. The companies have claimed in a press release that this purchase will result in an \$8 billion net increase in AT&T's investment in its domestic wireless infrastructure over seven years.¹

Given the job impact analysis noted above, a plausible range of impact would be between 55,000 and 96,000 job-years. To reiterate, the jobs estimate includes both direct jobs within the primary industries that meet the additional demand for goods and services and supplier jobs in the secondary industries that supply those primary industries with intermediate goods and services. The estimate also includes "induced jobs" created as incomes earned by newly hired workers are spent back into the economy. The figures are again listed as job-years, which refer to a job held for a single year.

Our estimate assumes that the \$8 billion in investment is spread equally over the seven-year horizon. We present a range of estimates to capture the fact that the overall economy will be different over these seven years—for example the CBO forecasts that we will have a declining unemployment rate over the horizon. The macroeconomic multipliers cited

earlier are most applicable during periods in which there is slack in the labor market. For years when the economy has a tighter market, the applicable multiplier will likely be lower, all else equal.

Given this, we estimate a range in which the upper bound incorporates the full effect of the multiplier over the entire seven years and the lower bound assumes zero net job creation in the last three years—when unemployment begins to approach a stable rate under CBO assumptions. Neither of these extremes is particularly likely, but this analysis presents a plausible range of impact.

In particular, net job creation during the last three years of this investment could well be greater than zero, especially given our skepticism that the labor market will automatically reach full employment by 2016 as CBO projects. But it is also likely that the net job creation per billion dollars of investment will fall if labor becomes scarcer. See the full results for each of the different tranches of jobs (direct, supplier, and induced) in **Table 2**.

TABLE 2

Jobs impact from \$8 billion investment over seven years in wireless network infrastructure

	Direct jobs	Supplier jobs	Induced jobs	Total jobs impact
<i>High-end</i>	27,297	36,676	31,986	95,959
<i>Low-end</i>	15,598	20,958	18,278	54,834

SOURCE: Author's analysis.

We should note that this is not a full job-impact estimate of the entire purchase of T-Mobile by AT&T. There are myriad other factors that would impact jobs. This memo only considers the effects of the capital investment in the wireless infrastructure and not the overall economic impacts of broadband more generally.

Endnotes

1. See the press release at <http://investmentwatchblog.com/att-to-buy-t-mobile-us-cnbc-bulletin/>

References

- Bivens, Josh. 2006. *Updated employment multipliers for the U.S. economy*. EPI Technical Paper.
- Congressional Budget Office. 2011. *Estimated Impact of the American Recovery and Reinvestment Act on Employment and Economic Output From January 2011 Through March 2011*.



May 24, 2011

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

RE: T-Mobile merger with AT&T (Docket 11-65)

Dear Chairman Genachowski and members of the Commission:

When policymakers discuss the public benefits of expanding high-speed wireless access, they often cite improvements in such areas as healthcare and education. To be sure, these are important but Future 500 (Future500.org) urges your consideration of an equally important public policy benefit: helping the environment.

Our support of the AT&T merger with T-Mobile is based on the clear environmental benefits our society will gain by deployment of high-speed wireless Internet networks. As more of these wireless networks are deployed, governments, businesses and consumers will all be able to do more to improve sustainability.

The spread of high-speed wireless networks offers remarkable opportunities to create a more sustainable, energy efficient society. These networks represent, in essence, a new core infrastructure, one as important to the 21st Century as the energy and transportation infrastructure were to the 20th Century.

The most-cited examples focus on how high-speed wireless improves the efficiency of energy and transportation. On a national scale, for example, advanced wireless networks help facilitate adoption of "smart grid" technology. If America's electrical grid operated just 5% more efficiently, the energy savings would be equivalent to eliminating the greenhouse gas emissions from 53 million cars.ⁱ

Wireless networks are also helping cities manage traffic more efficiently. In Los Angeles, for example, the city deployed a wireless monitoring system that allows traffic managers to change traffic light timing instantly to reflect changing traffic patterns and accidents. The system has helped reduce commuting times by as much as 20 percent.ⁱⁱ

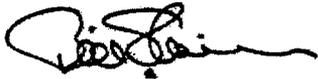
But even more significant are the ways that wireless networks become, in effect, direct sources of energy and transportation. There are myriad ways that these networks enable companies and people to meet their needs, without traditional transportation and fossil fuels at all.

For the mobile consumer, wireless applications are increasingly important to everyday environmental decisions. In recent years, mobile apps have emerged that allow homeowners to change heating, air conditioning, and water heater settings remotely.

AT&T has pledged an expanded deployment effort of next generation wireless systems if the merger with T-Mobile is approved. These wireless networks hold incredible promise for America's efforts to reduce greenhouse gases, improve sustainability and advance what Future 500 calls "the triple bottom line." This is the point at which the economy, environment, and society overlap, and are mutually reinforcing.

Given the importance that President Obama places on pro-environmental initiatives, we urge the FCC to expedite approval so that advanced wireless networks – with all the "green" potential they hold – will soon be available to millions more Americans.

Sincerely,



William K. Shireman
President and CEO

ⁱ Statistic taken from "The Smart Grid: An Introduction", Department of Energy report at: [http://www.oe.energy.gov/DocumentsandMedia/DOE_SG_Book_Single_Pages\(1\).pdf](http://www.oe.energy.gov/DocumentsandMedia/DOE_SG_Book_Single_Pages(1).pdf)

ⁱⁱ Los Angeles information is taken from a Connected Planet article at <http://connectedplanetonline.com/3g4g/news/los-angeles-traffic-m2m-0825/index.html>



STATE OF ARKANSAS
MIKE BEEBE
GOVERNOR

May 23, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WT Docket 11-65

Dear Mr. Chairman and Commissioners:

I write today to encourage the Federal Communications Commission to unanimously approve the proposed AT&T acquisition of T-Mobile USA. As a native of a medium-sized Arkansas community and as Governor, I am very familiar with the many benefits that mobile broadband offers. I have no doubt that this acquisition will benefit individual Arkansas consumers, small businesses, and small towns equally, as well as our largest employers and residents of our most metropolitan areas.

AT&T has demonstrated its commitment to serving our state. The company has brought wireline broadband to every central office in its Arkansas service area, including some rural exchanges with fewer than 250 access lines. AT&T has followed that effort with wireless service, including 3G, which is in place in our larger cities and in numerous smaller cities and towns.

This proposed acquisition will be even more beneficial, as it will allow AT&T to bring 4G LTE mobile broadband to an additional 55 million Americans, including many in smaller communities that are underserved today. Universal broadband access is a central goal of President Obama's vision for America, and it is vital for Arkansas; our state has more than 2.9 million residents, 1.16 million of whom live in rural areas where wireline broadband may be unavailable. In addition, the federal Centers for Disease Control and Prevention reported in late April 2011 that at least 35 percent of Arkansans have wireless phones only, reflecting a growing nationwide trend. The only way to achieve universal broadband access is to promote the expansion of 4G mobile broadband.

I have seen the map showing how this acquisition would bring 4G LTE coverage to virtually all areas of our state, and it's exciting. For Arkansans, especially those in smaller communities, 4G mobile broadband means access to state-of-the-art technology for health care, education, and other social services, as well as new jobs and economic growth.

I urge you to weigh very carefully any call to force AT&T to divest 4G spectrum, especially in Arkansas. In a previous merger, the Commission required AT&T to divest itself of some key 3G spectrum in our state. Well-intentioned though it was, that requirement did not have the desired benefits of increasing competition and consumer choice. The acquiring company did not take the steps necessary to make that spectrum available. As a result, residents in some of our state's largest cities and numerous small towns were delayed several years in gaining vital 3G access. Consumers were denied service and choice. Please work to avoid a repeat of that result, as far as 4G LTE is concerned.

One of the great opportunities for 4G usage is in agribusiness, a major employment sector and the source of 14 percent of state tax receipts in 2009. With 4G, Arkansas farmers and ranchers could use mobile technology to remotely monitor and manage livestock and poultry, improve chemical applications, and closely control irrigation systems to conserve resources. Our farm economy and the entire state would benefit.

Arkansas is home to several internationally known companies recognized for their technology leadership – from software development to the innovative use of logistics technology to medicine. We are working hard to increase Arkansas's technology-based economy, and the advanced video streaming and other real-time services that can operate over 4G networks are essential to our competitiveness. A 4G network would be a boon for telemedicine and distance learning, two areas in which Arkansas is a pioneer and leader today.

Arkansas consumers can expect to benefit in several ways: The 4G LTE network will be more reliable, faster, and support new services. Consumers will have more choices of services and new devices that go far beyond "smart phones." Telecommuting and job growth will create new career options.

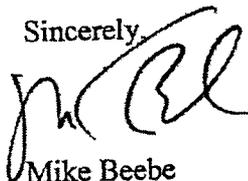
Despite what merger critics may say, history shows that wireless mergers effectively lower consumer prices. As you know, there were five major wireless mergers from 1999-2009. In 2010, the Government Accountability Office released a study showing that during the same timeframe, the overall average price of wireless services fell 50 percent when adjusted for inflation.

AT&T has a long history of investing in Arkansas and America: From 2008-2010 alone, the company invested more than \$500 million in its Arkansas networks – both

wired and wireless – and there are more than 2,400 AT&T employees working in our state today. During the recent economic downturn, AT&T remained one of the nation's largest capital investors. The T-Mobile acquisition will mean AT&T invests an additional \$8 billion in infrastructure over the next seven years. Arkansans will benefit from that investment through new education and health choices, economic growth and job opportunities, and greater choice of mobile broadband services.

I support the AT&T acquisition of T-Mobile USA and ask that you support it, as well. Thank you for your service to our country and for your careful consideration of the many benefits that will come from this acquisition.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Beebe", written in a cursive style.

Mike Beebe

MB:jb



COMMONWEALTH OF KENTUCKY
OFFICE OF THE GOVERNOR

STEVEN L. BESHEAR
GOVERNOR

700 CAPITOL AVENUE
SUITE 100
FRANKFORT, KY 40601
(502) 564-2611
FAX: (502) 564-2517

May 26, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: WT Docket 11-65

Dear Mr. Chairman and Commissioners:

In Kentucky, we understand the critical role technology and innovation play in creating jobs in the 21st century. We must build the strongest business environment we can in order to attract and retain businesses that will hire the next generation of Kentuckians. One of the tools fueling economic growth is the availability of fast and dependable wireless broadband networks.

Kentucky is primarily known for coal mining, horse racing and college basketball and Kentuckians are proud of that, but the "Bluegrass State" is defined by much more than this. Farming is a big part of Kentucky's economy and the auto-manufacturing industry has grown significantly in the past five years. Every business in Kentucky can benefit from increased access to the latest high speed, mobile broadband and consumers across the country are demanding expanded access and quality broadband service. Schools, universities, hospitals and healthcare institutions can greatly benefit from next-generation 4G LTE mobile broadband. There is no question that new digital technologies are beginning to change the landscape in every facet of our lives.

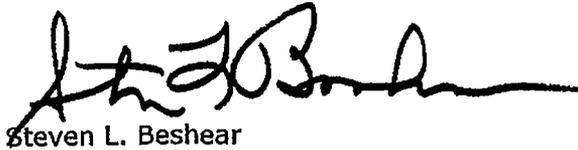
The residents of Kentucky want to fully participate in the digital age, creating businesses anywhere, regardless of whether they live in a big city or a small town. Our Commonwealth is making investments and launching initiatives to enable this, but we cannot do it alone. The merger of T-Mobile USA and AT&T is a private-sector initiative that complements our efforts to build Kentucky's future now and that's why I support it. Once approved, the merged company would be able to expand the upgrade of its existing wireless networks to offer our residents, businesses, schools, hospitals, and other organizations with access to state-of-the-art mobile broadband technologies.

CHAIRMAN JULIUS GENACHOWSKI
COMMISSIONER MICHAEL J. COPPS
COMMISSIONER ROBERT M. MCDOWELL
COMMISSIONER MEREDITH ATTWELL BAKER
COMMISSIONER MIGNON CLYBURN
May 26, 2011
Page 2

In a global economy, faster broadband deployment creates jobs across all industries and sectors. As one of the larger employers in Kentucky, AT&T's capital investment and growth has benefitted hard-working families across our great state. We look forward to seeing this continue as AT&T invests in its workforce and the deployment of the newest technology to all corners of Kentucky.

In a time where the pressure to compete globally has never been greater, we must act now to ensure states like Kentucky are on the leading edge of innovation, not falling behind. This merger will help us stay competitive and move forward as we look towards the future. It is for that reason and many more that I urge you to approve the T-Mobile/AT&T merger so Kentucky businesses and consumers will be able to share in the economic benefits it will bring.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Beshear", written in a cursive style.

Steven L. Beshear



TERRY E. BRANSTAD
GOVERNOR

OFFICE OF THE GOVERNOR

KIM REYNOLDS
LT. GOVERNOR

May 26, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Commissioners,

Whether as a private citizen, state legislator, lieutenant governor, or now as the governor of the State of Iowa, I have worked on rural economic development issues for the majority of my professional life. Today, as with most areas of the country, rural America is undergoing significant and, I believe, enduring economic changes. In these communities, the expansion of wireless broadband access is a central component of successful economic development and will, in many respects, determine whether small towns are able to attract and keep businesses in the coming years.

Recently, I read that 2013 may be the first year where the number of people accessing the Internet through smart phones exceeds the number accessing it via a desktop or notebook PC. The public is driving this shift and, as a result, businesses large and small are building strategies around the accessibility of wireless technology. It will be far more challenging, if not impossible, for communities without adequate wireless access to attract new businesses and more jobs in the future. The long-term implications of that trend have the potential to be devastating to the thousands of small communities in Iowa and around the country.

With all this in mind, I am writing to you today because I believe the merger between AT&T and T-Mobile, under your review, is a critical step in bringing enhanced wireless connectivity and providing greater opportunities to all our small towns and cities. The merger will bring 4G LTE technology to 55 million more Americans than under the original plan, and to more areas of the country than without the merger.

With more and higher-quality wireless options, Iowa will be able to create additional business opportunities, provide better educational opportunities, and more accessible health care options for thousands of Iowans.

Moreover, as governor, I am also mindful of how critical wireless technology is to public safety. The state of Iowa has witnessed a number of severe weather

emergencies in recent years, including the devastating floods in eastern Iowa in 2008. The ability of citizens to communicate and contact first responders and other safety officials is more and more dependent on effective digital technology. The merger will strengthen the wireless network, which in turn will help consumers stay connected

As we look to the future, it's clear that broadband wireless technology will play a bigger role in making the government more accessible to our citizens, enhancing opportunities for private business, and improving the day-to-day lives of the general public. Now is the time to make the necessary investments to ensure that all Americans can see the benefits of these advances. I urge you to approve the merger between AT&T and T-Mobile to help drive innovation and provide valuable services to all communities particularly those that historically have been underserved.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry E. Branstad". The signature is fluid and cursive, with a large initial "T" and "B".

The Hon. Terry E. Branstad
Governor of the State of Iowa

CC:
Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



STATE OF GEORGIA
OFFICE OF THE GOVERNOR
ATLANTA 30334-0900

Nathan Deal
GOVERNOR

May 17, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 11-65

Dear Chairman Genachowski and Commissioners:

As Governor of a very economically and socially diverse state such as Georgia, I urge you to support AT&T's acquisition of T-Mobile USA. If approved, this acquisition will benefit many Americans and the state of Georgia, which is home to AT&T Mobility. From urban to rural areas, businesses and workers, minorities and our children all stand to gain by combining these two networks and helping to connect our citizens to the latest technology.

The communications industry has changed drastically over the past twenty years. Being able to connect to the global world is no longer a luxury but a necessity for our businesses and consumers in Georgia and across the country. With this acquisition, 97 percent of the country will have access to 4G LTE including 55 million more Americans who would not otherwise have seen the benefits of having next-generation mobile broadband.

This access to 4G LTE technology will help encourage innovation and create new jobs and economic growth in my state. With it, our local businesses can compete with a global marketplace, our schools will have greater resources to educate our children, and doctors will be able to connect to more patients, among many other advantages. It's important that we ensure that our wireless networks are fast and reliable to promote these technologies and help businesses thrive.

Again, I hope you will support AT&T's acquisition of T-Mobile USA. Georgia and our entire country stand to benefit from these two companies coming together to provide affordable next-generation wireless technology to more Americans.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Nathan Deal".
Nathan Deal



Mary Fallin

Governor

May 16, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket 11-65

Dear Chairman Genachowski:

The future of Oklahoma is bright. Our economy helps to feed the nation through the production of livestock and crops and powers growth through the extraction of oil, natural gas and by harnessing the wind. These natural resources coupled with the thousands of hard-working and innovative Oklahomans who drive our economy through small businesses and our aerospace, energy and military sectors provide a path to prosperity.

Growth is fueled by a business-friendly environment, by a high quality and efficient healthcare delivery system that keeps workers healthy and by an educational system that ensures we're developing relevant skills in the workers of the future.

The proposed merger between AT&T and T-Mobile USA offers a unique opportunity for Oklahoma. Efficiencies realized with successful completion of this merger will bring fast wireless broadband to a large percentage of Oklahomans that otherwise would not have access to these important services. High speed wireless broadband could be transformative for many areas of our state and help eliminate many of the geographic disparities that exist.

The synergies of this merger will bring new wireless capacity to Oklahoma and increase broadband availability in areas of our State that need it most. The merger will also benefit Oklahoma wireless consumers through increased service and expanding the deployment of advanced wireless broadband services throughout the State.

A strong business climate is made up of the right policies and a strong infrastructure. One begets the other, and Oklahoma is making great strides in creating a policy framework that encourages business to invest and expand. Investment in our state's infrastructure is critical. Given the current economic issues in our state and others, private investment and innovation is paramount to future growth.

We're working to improve the quality, speed and efficiency of our state's healthcare system. High speed wireless access allows rural healthcare providers and hospitals to access a wider range of information and treatment options. It can remove obstacles of geography and accessibility, making higher quality healthcare at more reasonable costs a reality.

The benefits of increased wireless broadband services for our education system are almost too many to count. This technology can literally bring the world to our classrooms. For instance, a more diverse course offering can be a reality for rural students. Teachers are able to share ideas, techniques and even classrooms – instantly.

I urge your support of this merger and the opportunity it will bring our state. Oklahoma has been blessed with natural resources and a population of innovative and hard working people that have always found a way to succeed. High speed wireless broadband is a tool that we will use to build the highway on which innovation and investment will drive us into a more prosperous future.

Sincerely,



Mary Fallin
Governor

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



State of South Carolina Office of the Governor

NIKKI R. HALEY
GOVERNOR

1205 PENDLETON STREET
COLUMBIA 29201

May 21, 2011

Federal Communications Commission
Chairman Julius Genachowski
445 12th Street, SW
Washington, DC 20554

Dear Chairman Genachowski,

In South Carolina, I continually work with the General Assembly to promote policies that encourage private investment, create jobs, and economic opportunities for the citizens of the State. You will soon be considering the AT&T/ T-Mobile proposed merger which represents a substantial investment of private capital that would benefit the citizens of South Carolina.

This merger will enable a more efficient and effective use of available spectrum. AT&T's current 4G LTE deployment plan in South Carolina focuses on our population centers, and while it reaches a large number of citizens, there are nonetheless large areas of the state which would be left without coverage. If the merger is approved, however, there will be significantly broader coverage. Our state is a sea of small towns and rural communities, with islands of population and commerce in the Upstate, Midlands and Lowcountry. For the vast majority of our residents, this expanded investment in mobile broadband is a game-changer. From a technological perspective, it will put small towns like Bamberg and Chesterfield on an even playing field with population centers like Greenville and Charleston in their efforts to attract new jobs and take advantage of educational opportunities.

I know that in exercising due diligence in evaluating this proposed merger, the FCC will take into account the need of the citizens of South Carolina for the significant broadband benefits the merger will bring. At the end of the day, I would ask for the FCC's consideration and approval of this merger.

My very best,

A handwritten signature in black ink, appearing to read "Nikki R. Haley".

Nikki R. Haley
NRH/ep

cc: Commissioners Meredith Attwell Baker, Mignon Clyburn, Michael J. Copps, Robert M. McDowell



BILL HASLAM
GOVERNOR
STATE OF TENNESSEE

May 27, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Allwell Baker
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th Street SW Washington, DC 20554

Re: GN Docket 11-65

Dear Chairman Genachowski and Commissioners:

As governor of Tennessee, I am writing to ask you to support AT&T's acquisition of T-Mobile USA. The combination of these two networks would create an environment for expanded access to broadband technologies that helps grow our economy, attract high-quality jobs, and will provide greater resources for our classrooms.

With this proposed acquisition, 95 percent of Tennesseans will have access to next generation mobile broadband—an expansion that will help many areas which are in need of these technologies, particularly rural areas. This access to "4G LTE" technology will promote innovation and create new jobs, spurring economic growth in my state.

Benefits are not just economic. Tennessee is a leader in education reform, and with this technology, schools will have greater resources from which to choose. As we look to expand broadband access to rural areas, this acquisition will increase the resources available to bridge the digital divide in the classroom. It's important that we ensure that our wireless networks are fast and reliable to promote these technologies and help our students achieve.

Whether it is economic development or educational achievement, Tennessee stands to benefit from these two companies coming together. By providing affordable next-generation wireless technology to more people, we all win. Again, I hope you will support AT&T's acquisition of T-Mobile USA.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Haslam", with a horizontal line extending to the right.

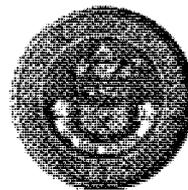
Bill Haslam
Governor – State of Tennessee

Cc: Mr. Gregg Morton, President, AT&T Tennessee

STATE OF COLORADO

OFFICE OF THE GOVERNOR

136 State Capitol
Denver, Colorado 80203
Phone (303) 866-2471
Fax (303) 866-2003



John W. Hickenlooper
Governor

May 27, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th St, SW
Washington, DC 20554

Re: WT Docket 11-65

Dear Chairman Genachowski and Commissioners:

This letter is in support the proposed merger between AT&T and T-Mobile.

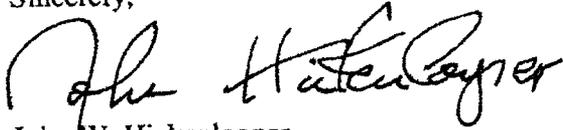
Over the past several months, we have organized a “bottom up” economic-development planning process that has involved every county in Colorado. Our goal is to better integrate local economic concerns in developing a state economic development plan. In this process we have heard from communities and individuals across the state. Improving broadband access for non-urban communities has been a consistent concern.

In urban, suburban and rural parts of Colorado, business owners, students, families, doctors and universities are – and they should be – fast approaching the wireless network’s current capacity with their ideas, research ambitions or business applications. We should not allow the limits of communications capacity to inhibit a community’s economic potential.

Right now, fast wireless connections are widely available, but primarily in urban corridors along major interstate highways. If the proposed merger is approved, our hope is that high speed access will spread across our state – spurring innovation and connecting Colorado communities. Coloradans will be part of the 55 million additional Americans who can benefit from access to 4G LTE technology.

As you consider the policy consequences of this proposed merger, please give close attention to the prospect we have for enhancing capacity and improving connectivity so that more communities – particularly in rural areas – can fully participate in the economic potential of broadband access.

Sincerely,

A handwritten signature in black ink, reading "John W. Hickenlooper". The signature is written in a cursive style with a large initial "J" and "H".

John W. Hickenlooper
Governor



BOBBY JINDAL
GOVERNOR

Post Office Box 94004
Baton Rouge, LA 70804-9004

OFFICE OF THE GOVERNOR

May 19, 2011

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket No. 11-65. In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations.

Dear Chairman Genachowski and Commissioners:

I am writing to share my support for the merger between AT&T and T-Mobile, which will result in more mobile broadband coverage throughout Louisiana.

The availability of mobile broadband is a critical component to drawing in new businesses and growing the ones already in our state. With this merger, Louisiana communities and businesses, especially in our rural areas, will be able to participate and compete even more in the global economy. More than half of Louisiana's parishes are considered rural, and the expansion of technology here will help spur both innovation and economic development in areas that need it the most.

Job creation has been a major focus of my administration and I support any efforts that aid our state in moving forward. Adding mobile broadband capacity will help create more opportunities for Louisianians—Louisianians who will not have to leave our state to secure a great education or find a rewarding career.

AT&T has a strong track record in Louisiana. From 2008 to 2010, AT&T invested \$2.8 billion in its wireline and wireless networks in Louisiana. Network enhancements like these benefit countless consumers while making our state an attractive place to work, live, and play.

I am confident that this merger will benefit the people of Louisiana.

Sincerely,

Bobby Jindal
Governor



Paul R. LePage

GOVERNOR

May 19, 2011

STATE OF MAINE
OFFICE OF THE GOVERNOR
1 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0001

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket No. 11-65. In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations.

Dear Chairman Genachowski:

I am writing to express my support for the proposed merger between AT&T and T-Mobile. By combining their networks, the merged wireless companies have stated that they will be better able to provide high-speed broadband wireless capacity in rural states, including my home state of Maine. This is an important issue to our business and citizens, as they will benefit significantly from an expansion in access to the latest in wireless technology.

I have paid particularly close attention to this matter since it was announced as T-Mobile has a call center in Oakland, Maine that is a major employer in the state. The call center employs approximately 800 people and serves as the anchor in a high-tech business park that covers 285 acres near interstate 95. For those good paying jobs to remain in place over the long-term, the call center needs to be owned by a strong company. Based on the information provided by both companies and other information publicly available, I believe the proposed merger is the best path toward that goal.

AT&T and T-Mobile make a compelling case that they are handicapped in rolling out fast new wireless networks because of the lack of new spectrum that is needed to serve the exploding traffic on their networks. In addition, it is my understanding that AT&T's and T-Mobile's wireless networks are compatible technologically in ways that will enable them to extract significant efficiencies in costs and usage of spectrum from their merger that no other two companies could achieve together.



For a rural state like Maine, the economic benefit of having access to the fastest wireless technology available is significant. To realize the promise of better opportunities for our businesses, expanded access to healthcare through telemedicine, and new educational opportunities available provided through distance learning, requires access to the latest in communications technology. As described by AT&T and T-Mobile, the proposed merger will help accelerate access to 4G LTE technology and close the digital divide in our state.

For the reasons state above, I believe the benefits of this merger are significant to Maine.

Sincerely,



Governor Paul LePage



C. L. "Butch" OTTER
GOVERNOR

May 17, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Dear Chairman Genachowski,

Idaho's economic vitality depends on the ability to compete across the street and around the globe. In today's connected world, that is only possible with a robust wireless infrastructure. That's why I urge your support of the merger of AT&T and T-Mobile.

Creating jobs for Idahoans requires a plan for harnessing Idaho's immense resources, talents and entrepreneurial spirit and leveraging them with public-private partnerships that work in the marketplace and our communities. That requires the kind of communications infrastructure that the proposed merger of AT&T and T-Mobile promises. Many thousands of Idahoans would be among the estimated 55 million more Americans who would benefit from the latest 4G LTE mobile technology.

While this clearly is helpful to business and families, it is particularly helpful in the area of emerging technology. Idaho is a hub for growth and innovation, consistently ranking No. 1 in the nation for patents per capita and manufacturing investment. A state-of-the-art wireless network will enable Idaho businesses to keep building on that tradition.

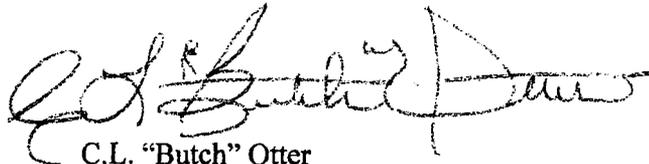
The proposed AT&T/T-Mobile merger will enable small businesses and agri-businesses to access 4G LTE wireless services that will drive the nation's most competitive business platforms, allowing them to expand and compete more effectively in domestic and world markets. Idaho's growing renewable energy sector in particular will see direct benefits from expanding wireless broadband capabilities. For instance, wireless Smart Grid technologies figure to be a major component of the new energy economy that is a major focus of our efforts to create more career opportunities here at home.

An important element of creating an environment where that is possible is the ability to connect both quickly and reliably across our geographically diverse state. Connecting our citizens enables Idaho businesses to efficiently and cost-effectively bring our products and services to the world.

Chairman Julius Genachowski
May 17, 2011
Page 2

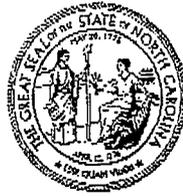
The bottom line is that the proposed merger between AT&T and T-Mobile USA will be a significant factor in the continued economic success of the state of Idaho. I appreciate your support and your positive consideration of the proposed acquisition.

As Always – Idaho, “Esto Perpetua”

A handwritten signature in black ink, appearing to read "C.L. Butch Otter". The signature is fluid and cursive, with a large initial "C" and "O".

C.L. "Butch" Otter
Governor of Idaho

CLO/mw



STATE OF NORTH CAROLINA
OFFICE OF THE GOVERNOR
20301 MAIL SERVICE CENTER • RALEIGH, NC 27699-0301

BEVERLY EAVES PERDUE
GOVERNOR

May 31, 2011

Chairman Julius Genachowski
c/o Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Genachowski:

The State of North Carolina has a long history of embracing and capitalizing on technological advances to create economic and education opportunities for our citizens. In 1959, we created the Research Technology Park to capitalize on the expertise and talent of our research universities.

The proposed merger of AT&T and T-Mobile presents another development in the marketplace which can benefit the people of my state.

The communications market in North Carolina, particularly in the wireless arena, is dynamic. Recently, the NC Utilities Commission announced the Raleigh area will soon implement a new area code, the eighth in the state, due primarily to the tremendous growth in wireless service.

In North Carolina we are committed to stimulating investments in advanced technology, and encourage quality service for the public. We look forward to working closely with AT&T to foster these important goals.

On behalf of the people of North Carolina, I appreciate your strong consideration in favor of the proposed merger of AT&T and T-Mobile.

Sincerely,

Beverly Eaves Perdue





OFFICE OF THE GOVERNOR

RICK PERRY
GOVERNOR

May 25, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon L. Clyburn
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: WT Docket 11-65

Dear Chairman Genachowski and Commissioners Copps, McDowell, Baker and Clyburn:

Texas' jobs and economic climate is the best in America, and we aim to keep it that way. Our state's strong, diversified economy and business-friendly policies land Texas at the top of countless media and national organizations' lists of best states for business and job growth.

It's not luck that we find ourselves in such a comparatively strong position. It is a credit to a business and regulatory climate that spurs investment, encourages commercial expansion and provides a high quality of life that's attractive to families.

Texas leaders and employers also know that we must deliver on critical communication and transportation infrastructure to remain competitive and prosperous. Our state and our nation need world-class communication and access to cutting-edge technology. That is why I support the proposed merger between Dallas-based AT&T and German-owned T-Mobile USA.

First, the commitment of at least an additional \$8 billion in private investment over seven years as a result of this merger is significant. Texans know the benefits of private investment in spurring job creation, encouraging economic growth and catalyzing the next great technological leap forward. This level of investment is a boon for Texas, but even more so for our larger American economy.

The combined strength of AT&T and T-Mobile also means that millions more Americans – including in rural communities across Texas and the southwest – should have high-speed wireless broadband in their grasp for the first time.

Here in the Lone Star State, residents in deep South Texas and the fast-growing Rio Grande Valley should enjoy access to high-speed LTE service for the first time.

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon L. Clyburn
May 25, 2011
Page 2

In an environment where demand is strong and spectrum supply is limited, the increased network capacity and output resulting from uniting AT&T and T-Mobile are the best way to ensure broader access to enhanced, high-speed services. For traditionally underserved areas or hard-to-reach rural portions of our state, the impact of this merger should not be understated.

Serving these populations is a significant milestone as we increasingly rely on mobile apps to educate, communicate, deliver health care, move goods and provide dynamic platforms for businesses to compete in the global marketplace.

We also believe that the combined resources and networks should ensure that the spectrum crunch our nation faces is lifted to some extent, providing a higher quality of service to more wireless customers.

We have all benefited from the highly competitive wireless marketplace that flourished even in our most challenging economic times, thanks in large part to a light regulatory touch. New competitors, advanced technologies and cutting-edge devices continue to enter the marketplace. I believe that this merger will continue to provide for great consumer choice, offer a wide range of service options and spur continued innovation.

The future rests in wireless broadband, and the federal government's swift approval of the merger between AT&T and T-Mobile would send a strong signal to employers, consumers and states that our federal government is serious about meeting the communication and technology needs of Texans and all Americans.

Sincerely,

A handwritten signature in black ink that reads "Rick Perry". The signature is written in a cursive, slightly slanted style.

Rick Perry
Governor

RP:mop

ONE HUNDRED ONE NORTH CARSON STREET
CARSON CITY, NEVADA 89701
OFFICE: (775) 684-5670
FAX NO.: (775) 684-5683



555 EAST WASHINGTON AVENUE, SUITE 5100
LAS VEGAS, NEVADA 89101
OFFICE: (702) 486-2500
FAX NO.: (702) 486-2505

Office of the Governor

May 27, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WT Docket 11-65

Dear Chairman Genachowski:

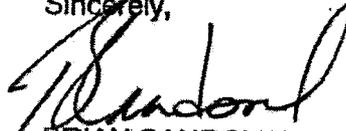
I am writing to express my support for the proposed merger between AT&T and T-Mobile, which will significantly expand access to advanced high-speed broadband wireless coverage in Nevada. During this period of severe economic challenges in Nevada, we must pursue all available opportunities to spur economic growth and create new jobs. The availability of next-generation wireless technology will allow Nevada to embrace opportunities to fortify its economic future and help increase business activity in all sectors of the state.

Many residents and businesses in rural Nevada communities do not have access to the same level of fast wireless broadband coverage that is available in Nevada's two largest cities, Reno and Las Vegas. The proposed merger will not only enhance coverage in Nevada's larger cities, but also provide high-speed wireless broadband service to rural Nevadans for the first time. This expansion in coverage will enhance connectivity and economic development in areas of Nevada that need it most.

Increased wireless broadband service will provide numerous economic and educational opportunities to Nevada's citizens: expanded service will allow K-12 students in rural areas to wirelessly connect to classrooms in larger communities; small business owners will be able to better track inventory and place merchandise orders from any location; college students will enjoy access to robust wireless applications that are revolutionizing higher education; and access to this wireless technology will enable Nevada's farmers to track herd movements or crop performance over vast acreage, perched on a combine. The possibilities are endless.

With the expanded wireless broadband capacity that will result from the AT&T/T-Mobile merger, many Nevada constituencies will benefit and become better positioned to help move our state forward in continued economic recovery. With these matters in mind, I urge your support of this merger and the opportunity it will bring to the people of Nevada.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Sandoval", written over the printed name.

BRIAN SANDOVAL
Governor

cc: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



STATE OF MICHIGAN
EXECUTIVE OFFICE
LANSING

RICK SNYDER
GOVERNOR

BRIAN CALLEY
LT. GOVERNOR

May 19, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

*Re: In the Matter of Applications of AT&T Inc. and Deutsche Telekom AG for
Consent to Assign or Transfer Control of Licenses and Authorizations
(WT Docket No. 11-65)*

Dear Chairman Genachowski and Commissioners:

As Governor of Michigan, I am writing to express my support for the agreement between AT&T and T-Mobile (owned by Deutsch Telekom AG) to merge their wireless networks and allow the two companies to offer more high-speed broadband wireless capacity and service to consumers and businesses in the Great Lakes State.

Since taking office in January of this year, my administration has made Michigan's economic comeback its top priority. An important part of meeting this goal for the residents of our state is supporting and encouraging activities that stand to increase investment in Michigan and offer consumers and businesses greater access to the tools they need to succeed. The proposed merger of AT&T and T-Mobile does both.

In the news coverage and conversation surrounding this merger, terms like "spectrum," "compatibility," and "LTE" have often been used, and each helps describe the important positive points of this potential merger. Additional spectrum is required to bring about and deploy advances in next generation communications. The compatibilities of AT&T and T-Mobile's network technologies will allow for greater network efficiencies, and therefore increase effectiveness of service for consumers.

For Michigan, however, "reinvention" is the word that best describes the basis of my support. The expanded wireless broadband network will extend to all corners of our state, promising faster speeds and more reliable services that will help employers and

Federal Communications Commission
May 19, 2011
Page 2

consumers across Michigan reinvent the way they do business, communicate, and compete. The innovation this will foster will help drive our economy, attract investment, and create new opportunities for employment.

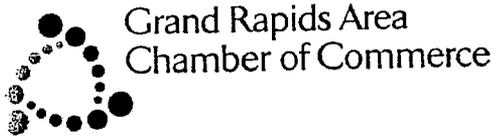
AT&T has been a consistent contributor to Michigan and the state's economy for more than a century. The company employs roughly 10,000 Michiganders and communities across the state rely on the AT&T network to do business and communicate locally and globally. The benefits of this merger are significant for Michigan, especially at a time when leaders at all levels of government, in business, and in philanthropy, are working together to reinvent our state in order to rebuild our economy and attract new and better opportunities for our residents.

The increased and enhanced services to come from this merger will assist in these shared efforts and are the reasons the AT&T/T-Mobile merger has my support.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Snyder", written in a cursive style.

Rick Snyder
Governor



May 25, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

RE: In the matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or transfer control of licenses and authorizations (WT Docket No. 11-65).

Dear Chairman Genachowski:

With more than a 120 years of experience creating opportunities for business success, the Grand Rapids Area Chamber of Commerce is the premier business membership organization in West Michigan. Though we count the area's largest employers among our more than 2,700 member businesses, more than 80 percent of our members are small businesses with less than 50 employees.

By focusing on Membership, Diversity and Advocacy efforts, the Grand Rapids Area Chamber of Commerce is a community partner that provides value for members, enhances the business climate in the area, and advocates for public policy that supports economic growth and vitality.

We firmly support policies and measures that promote high-tech innovation in Michigan and across the US, because we believe that they are vital for promoting a thriving marketplace in this digital age.

We are supportive of the proposed merger of AT&T with T-Mobile because we believe that the enhanced wireless investment it will bring will be good for Michigan businesses, particularly the small businesses that comprise the vast majority of our membership.

In this challenging economy, small businesses are the engine of the majority of new job growth – so supporting those businesses by providing them with access to the tools they need to be successful should be our top priority. We hope that you agree.

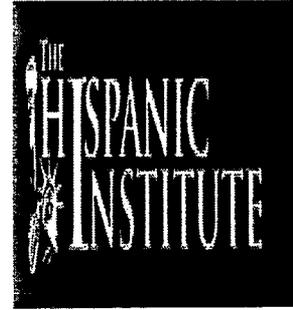
Sincerely,

A handwritten signature in black ink that reads "Rick Baker". The signature is written in a cursive, slightly slanted style.

Rick Baker
President & CEO

CC:

Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



May 24, 2011

Dear Chairman Genachowski,

The Hispanic Institute respectfully requests the attached study entitled "Connected Hispanics and Civic Engagement" be included into WT Docket No. 11-65. It is a study recently released by The Hispanic Institute that talks about the increased connectivity of Latinos across the country and how that ability to use mobile broadband technology enables communities to become increasingly engaged and civically active. The Hispanic Institute believes the pending AT&T and T-mobile merger will enable even more Latino families to enjoy this kind of connectivity for civic benefits as well as that of increased job opportunities, education, tele-health, entertainment, and just keeping in touch with family.

The Hispanic Institute has put forth many statements and studies and spoken publicly of the need for the FCC and legislators to understand the current telecommunications landscape, and to take note of the tremendous growth in mobile technology that has benefitted many Latinos and their families across the country. As such, we would like to point to our most current study as yet more evidence that the telecommunications marketplace is working for Latinos, and that we believe the ATT merger will bring additional opportunities for more Latinos to get even more connected at greater speeds than ever before.

We appreciate the opportunity to share our study with the FCC and please do not hesitate to contact us if would like any additional information.

Thank you very much,

A handwritten signature in black ink that reads "Gus West".

Gus West
President, Board Chair
The Hispanic Institute
www.thehispanicinstitute.org

CC:
Commissioner Baker
Commissioner Clyburn
Commissioner Copps
Commissioner McDowell

The Hispanic Institute

May 2011

Connected Hispanics & Civic Engagement

Arnoldo Mata

Connected Hispanics & Civic Engagement

The Hispanic Institute (THI) provides an effective education forum for an informed and empowered Hispanic America. THI's work is focused in the following areas:

- The study of Hispanic and immigrant economic contributions
- Media monitoring
- Consumer fraud protection
- Citizenship education
- Technology, telecommunications, and the Digital Divide
- Financial services
- Energy

THI has produced studies on such topics as Hispanics and Retirement, Calling Card Fraud, Hispanic Broadband Access, Interchange Fees, and Immigration and Labor. In addition, the Institute has developed media education campaigns on crucial issues such as Immigration Reform, Labor and Business, Net Neutrality, The Digital Divide, and Interchange Fees.



www.thehispanicinstitute.org

EXECUTIVE SUMMARY

Few groups have benefitted more from advances in mobile technology than Hispanic Americans, who have become an increasingly dynamic and influential voice in American political and social discourse – or, as we have termed it in this paper, civic engagement. The convergence of greater reliance on handheld wireless devices for Internet access and the “app” culture fits within the Hispanic community’s future for increased civic engagement. It has become a key tool that can help bridge differences among communities in new ways.

As the data and statistics point out, Hispanics are already more invested in mobile devices and mobile access than other groups. As this population continues to grow to become the largest minority group within a few decades, it is important for the Hispanic community and the country to take advantage of this to foster greater civic engagement by Hispanics.

Such advances are critical as the country enters a new civic environment in 2012 with a likely more contentious and precarious political balance and as federal and state governments face major budget crises. The impact of likely budget cuts and program reductions will be felt in more communities. These governments are already moving toward greater use of mobile technology in their efforts to more accurately gauge the priorities of various communities. And though Hispanics are advancing in some areas of Internet access, the digital divide will persist unless the infrastructure is further developed to accommodate the needs of growing communities and accompanying increase in demand for mobile access.

The focus of this paper is on the impact of mobile communications technology on the development of Hispanic civic engagement. With the growing market of mobile devices, including the slew of tablets now entering the market, the need for wireless access will grow exponentially, making the mobile and wireless industries more critical to Hispanics’ and the country’s growth and success.

In addition to tracing the growth and development of mobile civic engagement among Hispanics, this paper proposes key policy points that deserve critical attention, including:

- A competitive environment that allows service and device providers to compete on level playing fields and gives consumers a variety of options to suit their needs;
- A market-based environment that promotes innovation and allows investors to recoup their investment;
- Flexibility of access to allow consumers to decide which access method best works for them;
- Expansion of bandwidth options to help providers and consumers keep up with access speeds comparable to the global environment; and,
- Regulatory relief that limits the fees federal, state and local authorities place on consumers and that could have the effect of deterring greater mobile access;

These issues are critical for the country at large, but it must be emphasized here that any policy that does not take into account the specific needs of Hispanics and their move toward mobile civic engagement will fail a substantial portion of the population. These policies must be pro-active and must be focused on the needs of this community for today and for the next generation.

INTRODUCTION

Americans have long gathered on front stoops in cities, on rural front porches, at small-town grocery stores, in church basements or in neighbors' living rooms to discuss the news and issues of the day. Freedom to talk, to organize and to take action is central to the American identity. It represents civic engagement at the most fundamental level, and it has been crucial to the nation's development as a strong and vibrant democracy. In fact, freedom of speech and expression led the list – which also included freedom from fear, freedom to worship and freedom from want – in President Franklin D. Roosevelt's famous “Four Freedoms” speech, delivered as his annual address to Congress in 1941. That speech, of course, inspired the iconic image of an earnest, ordinary American man speaking his mind at a town hall meeting, painted by Norman Rockwell and published by the Saturday Evening Post in 1943.

Regardless of national origin, Americans of all ethnicities have cherished the tradition of freedom of speech and expression, and they have used it to advance their interests and to influence the nation's priorities. And though town hall meetings and chats with neighbors remain essential elements of civic engagement, the introduction of new communications technologies has changed its character and pace. Today, it is faster and more expansive than anything earlier generations might have imagined. The Internet, social media such as Facebook and Twitter, and the traditional print, broadcast and cable outlets have enlarged the capacity for large numbers of people to be quickly mobilized. Today, sophisticated communications technology, notably smartphones and other mobile wireless devices, is in the hands of people to whom it was previously unavailable. Formerly isolated and marginalized groups have gained a powerful – and much needed – voice in the civic arena.

Few groups have benefitted more from these technological advances than Hispanic Americans, who have become an increasingly dynamic and influential voice in American political and social discourse – or, as we have termed it in this paper, civic engagement. The bases for Hispanic information-sharing and civic engagement are not new. Indeed, their roots can be found in the great plazas of cities and towns throughout Mexico, Central America, the Caribbean and South America. Those grand spaces have long been where people of all ages and social standing meet and mingle in the evening or on a Sunday afternoon. They are places to socialize, to discuss big ideas or simply to observe. The plazas provide a space to build a sense of community and to establish connections that traveled with immigrants to the United States. And though the great plazas have been left behind, the cultural impulse to connect has remained, and – as this report will show – it has been amplified by increasingly sophisticated use of mobile technology.

HISPANICS IN THE DIGITAL ARENA

Although the more than 48 million Hispanics in the United States were initially slow to jump into the digital arena, that situation is rapidly changing. From 2004 to 2008, Hispanic Internet users with home broadband connections grew from 28% to 68%, while overall U.S. Internet users with home broadband connections grew from 31% to 71% (Scarborough Research, 2009). By February 2009, the Hispanic online presence had grown to its highest level, at 20.3 million visitors, comprising 11% of the total U.S. online market (based on numbers of website visitors, time spent online and pages

visited) – an impressive statistic considering that Hispanics represent 15% of the U. S. population (comScore, 2009).

The important story for Hispanics, however, is in their embrace of mobile online technology. By the beginning of the millennium, they had already emerged as the most avid users of wireless services (Lebo, 2003). More than 87% of English-speaking Hispanics now own a cell phone, compared to 80% of Whites (Smith, 2010). Hispanics use their cell phones more frequently and use more features than the general population; they make more calls on their cell phones and send more text messages than Whites (Lenhard, 2010). More than 14% of Hispanic cell phone owners make and receive more than 30 calls on a typical day, compared to just 4% of White cell phone owners, and Hispanics send or receive an average of 10 texts a day, compared to just five texts a day for Whites (Lenhard, 2010). Additionally, Hispanics lead other groups in the use of mobile devices to access the Internet – 53% of Hispanics vs. 33% of Whites (Horrigan, 2009).

Hispanics have also made the transition to Web 2.0, focusing on social and information networking. The use of social networking sites by Hispanics in the U. S. has outpaced that of other groups (Smith, Schlozman, Verba, & Brady, 2009). English-preferring Hispanics were most likely (36%) to visit social-networking sites at least two to three times a month, compared to 34% for Asians, 27% for Spanish-preferring Hispanics, 26% for African Americans and 18% for non-Hispanic Whites – a trend that is reflected across all ages groups of the population (Smith, et al.). Hispanics' heavy use of social media mirrors the culture's dependence on strong, extensive social relationships.

CIVIC ENGAGEMENT VIA MOBILE TECHNOLOGY

The significance of the Hispanic acceptance of mobile technology cannot be overstated in the context of civic engagement. The use of cell phones builds upon the cultural affinity for close connections and opens the way for organized political and social action. Three areas in particular demonstrate the power of mobile technology in the Hispanic community: immigration, education and voter registration/mobilization.

Immigration

Few issues more aptly demonstrate the power of civic engagement than immigration, fueled by the use of social media, accessed by mobile technology. The issue resonates for Hispanics nationally, regardless of age, geography or country of origin. For example, thousands flocked to Facebook to support legislative action on the DREAM act, which would have provided a path to citizenship for children of undocumented residents. A casual search on Facebook lists several hundred sites in support of the DREAM Act, including many for specific states, regions and cities across the country. And, though the bill failed in the U.S. Senate by a 55-41 vote in the lame duck session of the 111th Congress in December 2010, Facebook pages in support of the legislation remain active.

Significant use of mobile devices and social networking for Hispanic civic engagement on immigration policy can be traced back to 2006, even though social media were still relatively new at the time. Rallies were being organized around the country in March 2006 to protest the Border Protection, Anti-terrorism, and Illegal Immigration Control Act of 2005, an exceptionally harsh anti-

immigration bill. It failed in the U.S. Senate, but its introduction sparked rallies to oppose it. In Dallas, a group of 4,000 Hispanic high school students used MySpace, e-mails and cell phone texting to organize a walkout in protest (Harris, 2006). The students' success served as an inspiration for a subsequent major demonstration in April 2006 in Dallas with 350,000 participants (Bada, Fox, Donnelly, & Selee, 2010).

The mobile communications-driven civic engagement lessons learned from the 2006 self-organizing students could also be detected in the 2009 coalition that included high school and college youth united to stop the deportation of Rigo Padilla, a then 21-year old Mexican-born student attending the University of Illinois at Chicago. Padilla's undocumented status was discovered when he was arrested for driving under the influence in January 2009. He had lived in the United States since the age of 6, when he was brought to the U.S. by his parents. The students' efforts on Padilla's behalf included online petitions to the Immigration and Customs Enforcement (ICE) agency using Facebook and other sites (Bada, et al.). The intense activity from this coalition eventually led to a temporary halt to the proceeding in December 2009.

Also in 2009, two organizations, Reform Immigration FOR America and the Fair Immigration Reform Movement coalition, developed an effective civic engagement campaign built on text-messaging to promote immigration related issues. The groups focused on providing simple alerts to send out key information, calls to action, quick responses to breaking news and soliciting feedback as a way of building a cohesive community. According to organizers, this resulted in increased numbers of people attending a number of rallies and hearings in 2009 compared to previous rallies in 2008 (Heatwole, 2010).

Mobile technology has allowed groups to make their voices heard directly by the larger community. For example, Mobile Voices, a joint project of the Annenberg School for Communication and Journalism at the University of Southern California and a nonprofit, the Institute of Popular Education of Southern California, has produced VozMob, which allows immigrant workers in the Los Angeles area to use their cell phones to record voice or video stories about their experiences to be posted online. The stories are then used to provide a more complete view of the immigrant community and their experience during a time of extreme tensions between immigrants and anti-immigrant activists (Vozmob.net, 2010).

Education

Use of mobile technology for education purposes is a rapidly advancing concept. As a recent Fast Company article pointed out:

“The U.S. Department of Education has earmarked \$5 billion in competitive school-reform grants to scale up pilot programs and evaluate best practices of all kinds. Major foundations are specifically zeroing in on handhelds for preschool and the primary grades. ‘Young kids and multisensor-touch computing are a huge area of innovation,’ says Phoenix Wang, the head of a startup philanthropic venture fund called Startl -- funded by the Gates, MacArthur, and Hewlett foundations -- that's entirely focused on educational investing. Google, Nokia, Palm, and Sony have all supplied handheld devices for teaching. Thousands of new mobiles -- not just smartphones but also ever-shrinking computers -- have come into use at schools in the United States and around the world just in the past year.” (Kamenetz, 2010)

This is especially important in the Hispanic community, where mobile access to broadband Internet service is popular, not only for children in school but also for adults. Austin, Texas-based software company *ediotoma* offers English-language mini-courses on cell phones to first-generation Hispanics. The lessons are tailored to meet specific needs, such as banking or retail shopping. This is just one example of how customizable, user-controlled content can be offered and consumed in short chunks in a small format. The mini-courses are entertaining and easily used (Kuchera, 2009). These types of short informational bursts can help provide Hispanics with information about a wealth of other topics and skills, including civic issues. It also points to Hispanics as willing consumers of such information when it is presented in a manner that fits within their cultural and lifestyle environments.

Voter Registration and Mobilization

Recent political campaigns have powerfully demonstrated the power of the Internet and social media to drive civic engagement results. One of the best examples of how this phenomenon has played out in the Hispanic community is a voter registration project conducted by The Hispanic Institute in Nevada in 2009:

The project primarily targeted Hispanic residents but included all residents within the target areas. The voter registration drive coincided with a series of immigration reform rallies organized by a number of community-based organizations, which allowed the THI team to take advantage of the convergence of events to utilize mobile technology to amplify their reach.

The project had both a voter registration and a Get-Out-The-Vote component. In addition to more than 134,000 individual contacts at homes, supermarkets and other public gatherings, THI staff and volunteers collected key data and registered eligible voters. Additionally, organizers collected cell phone numbers for all contacts, whether they were signed up as voters or not.

The THI voter registration project met its goal to register 10,000 new voters. Mobile communications technology drove the civic engagement effort. Once individuals were registered to vote, they were sent numerous text messages to remind them about early voting, voting site locations, availability of transportation to the voting sites, updates about ballot initiatives, and other information. Additionally, voters were given contact information and a central location for in-person contacts. This two-way mobile network allowed voters to access information when it was most convenient to them.

In the weeks leading up to the start of early voting and Election Day, THI staff were able use text messaging to gauge how many of the newly registered voters had taken part in early voting or were likely to wait until Nov. 2. With this real-time data, THI staff were able to then target particular neighborhoods, and even specific addresses, for additional in-person follow up. THI was able to provide quality, cost-effective research-based polling, real-time analysis and communications advice to drive messaging, registration efforts and get-out-the-vote activities.

The THI project also mobilized most of the newly registered voters, along with the larger population of registered Hispanic voters, to cast their ballots. In Nevada, 12% of all of the registered voters are Hispanic, but they comprised 16% of all voters taking part in the 2010 mid-term elections. In all, more than 104,000 Hispanics cast votes on Nov. 2 in Nevada. According to some exit polling

results, the massive Hispanic voter turnout played a key role in Senate Majority Leader Harry Reid's come from behind win (Berzon & Audi, 2010).

At the immigration reform rallies, participants were asked to send a text to a central site so that they could be added to the contact lists. These were used to register new voters as well as establish a contact list to address immigration issues. Rally organizers were able to provide participants with information about immigration issues, legislative actions, requests for letters or phone calls to legislators, immigration related activities or other immigration related topics.

Although the immigration reform rallies and voter registration drive were independent efforts, the two projects were able to take advantage of having targeted an overlapping population and taking advantage of the population's propensity for cell phones. According to THI project director Cuauhtemoc "Temo" Figueroa (C. Figueroa, personal communication, November 18, 2010), the target population rarely used email due to a lack of computers, but almost everyone had a cell phone, allowing the organizers of both groups to develop cell phone networks. This mobile-based network allowed organizers and participants to react quickly to any late-breaking issues. The network expanded as participants included their families and friends in the group texts and contacts.

The success of The Hispanic Institute's voter registration/mobilization drive clearly demonstrates that the population's use of mobile communications technology has pushed civic engagement to a new level that can benefit the entire nation.

THE FUTURE OF CIVIC ENGAGEMENT - THE "APP"

If Web 2.0 was about the rise of social networks and sharing, the next phase in the use of mobile communications technology is likely to be about direct engagement through "apps" – applications that allow users to access a variety of services or information on their handheld wireless devices. Just as they have shown a propensity to utilize mobile technology, Hispanics have also moved quickly to utilization of apps. Research shows that Hispanics are more likely than Whites to access video sharing/downloading sites on their mobile devices on a daily basis – 24%, compared to only 12% for Whites. Hispanics are also the leading users of banking/finance apps, with 32% of Hispanics having used one within the previous month, compared to 27% of Whites (Purcell, Entner & Henderson, 2010).

This has important implications for Hispanic civic engagement, including more involvement in local, state or national civic issues, ranging from simply keeping informed to taking active roles in changing laws and policies. For example, Verafirma, a California-based company, has developed an app that allows users to sign a ballot initiative using a smartphone. This allows citizens to develop ballot initiatives and spread them more quickly and easily than traditional methods (Davy, 2010). In the Padilla case mentioned elsewhere in this paper, an electronic petition was used to seek support for blocking his deportation using petitiononline.com.

Political apps have been utilized by a number of political campaigns to mobilize their supporters – in many cases, developed for specific candidates. The apps help users to forward information to their cell phone contacts, receive information about campaign events, access information on candidate

issue positions, donate money and access volunteer opportunities. The apps streamline the ways in which candidates connect to supporters, volunteers, donors, media and others. They also can be used to encourage voters to attend campaign events or to take part in rallies, voter registration drives or get-out-the-vote efforts on behalf of particular candidates or issues (Davy, 2010)

All apps that aid civic engagement need not be political in nature, however. Smart apps also promote other kinds of interactions between residents and local government. CitySourced, for example, is a service that provides residents with an easy to use online tool that allows them to identify and report public concerns (crime, safety, environmental or quality of life) to their local city for action. At the same time, participating local governments can receive real-time information on problem areas. The tool can be accessed with mobile devices.

Although there are no concrete data yet on how extensively Hispanics, specifically, are using apps for civic engagement, the following examples of how other groups are developing and using apps for general civic engagement point to the opportunities they present for Hispanic civic engagement.

One app developed in 2010, *Walking Edge* by Republican Web Development, has already been successfully used in recent elections to provide political organizers and volunteers a smartphone app and database of addresses for undecided voters and candidate-supporters. Using geo-location tools and Google Maps, the app allowed organizers to reach out to those voters and update data files in real time, giving campaign organizers a more accurate count of which voters had been contacted and their likely voting patterns (Davy, 2010).

In 2010, the official White House app was released. It delivers news from the White House's blog and newsroom, featuring videos and photos and live video streaming of White House events. With the Obama administration taking the lead by developing the White House app, other federal entities are also developing apps to allow staff to stay in contact with citizens and to create outreach efforts on upcoming issues, regulatory changes, product recalls and a host of other matters (Davy, 2010). For example, two websites, apps.gov and apps.usa.gov, provide access to a number of apps that allow users to access a number of government services. Following are four examples of many of the different types of apps available on these websites:

- UserVoice offers a free Government Civic Engagement Plan for government agencies to create citizen engagement sites (<http://uservoice.com/>).
- Google Moderator lets citizens submit and prioritize ideas, questions and feedback in a transparent, democratic way (<http://www.google.com/moderator/#0>).
- Dialogue App allows users to crowd-source ideas and policies online and to share, rate and discuss ideas to improve decision-making (<http://www.dialogue-app.com/info/>).
- MixedInk is a democratic, collaborative writing tool that lets groups of all sizes put their ideas and opinions into a collective text (<http://www.mixedink.com/main.php>).

The apps listed above represent merely the leading edge of opportunities that mobile technology offers to Hispanics as their civic engagement activities thrust them deeper into the mainstream of American political and social life.

CONCLUSION

The convergence of greater reliance on handheld wireless devices for Internet access and app development fits within the Hispanic community's future for increased civic engagement. It has become a key tool that can help bridge differences among communities in new ways. As Hispanics work to take advantage of apps, and even develop apps designed for their own needs, they will be able to foster their own civic involvement in new and more effective ways.

THI's Nevada voter registration project, discussed earlier in this paper, provides a clear example of how mobile technology can make a significant difference in civic engagement. Further expansion of the technology to individual voters, a process that already appears to be underway, will make future projects more efficient and effective. As the data and statistics point out, Hispanics are already more invested in mobile devices and mobile access than other groups. As this population continues to grow to become the largest minority group within a few decades, it is important for nonprofit organizations to take advantage of this. Concurrently, THI will seek to expand its use of mobile devices and software as it prepares to launch a similar project in 2011 in Arizona, Colorado, Florida, Nevada and New Mexico.

Such advances are critical as the country enters a new civic environment in 2012 with a likely more contentious and precarious political balance and as federal and state governments face major budget crises. The impact of likely budget cuts and program reductions will be felt in more communities. These governments are already moving toward greater use of mobile technology in their efforts to more accurately gauge the priorities of various communities. And though Hispanics are advancing in some areas of Internet access, the digital divide will persist unless the infrastructure is further developed to accommodate the needs of growing communities and accompanying increase in demand for mobile access (Shapiro & Hassett, 2010).

While the focus of this paper is on the impact of mobile communications technology on the development of Hispanic civic engagement, it should be noted that overall, the percentage of American homes accessing broadband service increased 25% for the 24 months through October 2009, and that the increase in demand for more bandwidth is leapfrogging the ability of Internet Service Providers (ISPs) to develop new infrastructure (Shapiro & Hassett, 2010).

To date, the mobile and wireless industries have been very successful in dealing with the current challenges of limited spectrum options in innovative ways that allow all users to access the content they want and need at the time they need it. This has helped in closing the digital divide for the Hispanic community and other groups. However, federal policies need to continue be pro-investment, pro-innovation that help deliver new and evolving services to consumers. With the growing market of mobile devices, including the slew of tablets now entering the market, the need for wireless access will grow exponentially, making the mobile and wireless industries more critical to the country's growth and success.

Specifically, future policy must include:

- A competitive environment that allows service and device providers to compete on level playing fields and gives consumers a variety of options to suit their needs;

- A market-based environment that promotes innovation and allows investors to recoup their investment;
- Flexibility of access to allow consumers to decide which access method best works for them;
- Expansion of bandwidth options to help providers and consumers keep up with access speeds comparable to the global environment; and,
- Regulatory relief that limits the fees federal, state and local authorities place on consumers and that could have the effect of deterring greater mobile access;

These issues are critical for the country at large, but it must be emphasized here that any policy that does not take into account the specific needs of Hispanics and their move toward mobile civic engagement will fail a substantial portion of the population. These policies must be pro-active and must be focused on the needs of this community for today and for the next generation.

References

- Bada, X., Fox, J., Donnelly, R. & Selee, A. (2010). Context Matters: Latino Immigrant Civic Engagement in Nine U.S. Cities. Washington, DC: Woodrow Wilson International Center for Scholars.
- Berzon, A. & Audi, T. (2010) How Reid Machine Held Off Upstart Conservative. *Wall Street Journal*. Retrieved from <http://online.wsj.com/article/SB10001424052748703509004575593231511257038.html>
- comScore. (2009). U.S. Hispanic Internet Audience Growth Outpaces Total U.S. Online Population by 50 Percent. Retrieved from http://www.comscore.com/Press_Events/Press_Releases/2009/4/U.S._Hispanic_Internet_Audience_Growth
- Davy, S. (2010). How Mobile Apps Are Revolutionizing Elections, Transparency. Retrieved from <http://www.pbs.org/mediashift/2010/02/how-mobile-apps-are-revolutionizing-elections-transparency056.html>
- Harris, P. (2006, April 9). Spanish DJs pump up the volume in America. *The Observer*. Retrieved from <http://www.guardian.co.uk/media/2006/apr/09/business.theobserver1/print>
- Heatwole, A. (2010). Mobile Done Right: Reform Immigration FOR America Mobile Campaign. Retrieved from <http://mobileactive.org/mobile-done-right-reform-immigration-america>
- Horrigan, J. (2009). Wireless Internet Use. Washington, D.C.: Pew Research Center.
- Kamenetz, A. (2010, April). A Is for App: How Smartphones, Handheld Computers Sparked an Educational Revolution. *Fast Company*. 144 60.
- Kutchera, J. (2009). Hispanics first use of internet is on cell phones. Retrieved from <http://latinobusinessreview.blogspot.com/2009/01/hispanics-first-use-of-internet-is-on.html>
- Lebo, H., (2003) The UCLA Internet Report—Year Three. Los Angeles: UCLA Center for Communication Policy.
- Lenhart, A. (2010). Cell phones and American adults. Washington, D.C.: Pew Research Center.
- Purcell, K., Entner, R. & Henderson, N. (2010). The Rise of Apps Culture. Washington, D.C.: Pew Research Center.
- Shapiro, R. & Hassett, K. (2010). A New Analysis of Broadband Adoption Rates By Minority Households. Washington, D. C.: Georgetown Center for Business and Public Policy in the McDonough School of Business of Georgetown University.
- Smith, A. (2010). Mobile Access 2010. Washington, D.C.: Pew Research Center.
- Smith, A., Schlozman, K. L., Verba, S. & Brady, H. (2009). The Internet and Civic Engagement. Washington, D.C.: Pew Research Center.
- The Power of the Hispanic Consumer Online. (2009). New York City: Scarborough Research.
- Vozmob (2010). About vozmob. Retrieved from <http://vozmob.net/en/about>

HISPANIC LEADERSHIP FUND™

May 31, 2011

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: WT Docket No. 11-65

Dear Chairman Genachowski and Commissioners:

The Hispanic Leadership Fund writes to you in support of the merger between AT&T and T-Mobile. We encourage the Federal Communications Commission to support the proposed merger of AT&T and T-Mobile because it will expand access to faster wireless broadband networks, move the United States wireless industry back into a leadership role in the global high-tech telecommunications marketplace, and provide investment for much needed infrastructure that will create a large number of jobs.

Not only will the potential merger enable expanded access to faster wireless broadband networks, but it will also establish the United States as a global leader in high-tech telecommunications and promote greater innovation, efficiency, and economic opportunity through the investment of private capital.

The power of enabling expanded access to high-speed wireless broadband networks cannot be understated. Those who presently lack such access would be empowered to participate in the Internet community in ways that benefit them as consumers, entrepreneurs, and citizens. Millions of individuals and working families across the nation, including in rural areas, will benefit from access to eHealth, educational programs such as distance learning, and e-business opportunities. Hispanics across the country stand to benefit from increased economic, civic, and social participation.

In addition to the publicly announced \$39 billion dollar purchase price, AT&T has also announced that the merger will result in an investment in infrastructure of \$8 billion over seven years. This substantial investment would come at a critical time for the American economy.

While we believe that consumers overall would benefit from the proposed merger, we are also aware that Hispanics are adopting wireless broadband at a rapid rate and using wireless devices in various aspects of their lives. Increased high-speed wireless broadband speed and accessibility will boost Hispanic participation in the ongoing digital revolution. The substantial infrastructure investment will also result in job creation and increased economic development in Hispanic communities.

We strongly urge the FCC to consider the benefits of the proposed merger between AT&T and T-Mobile.

Sincerely,



Mario H. López
Hispanic Leadership Fund

http://

Hispanic Technology & Telecommunications Partnership

Advancing Access to Broadband Technologies for Unserved and Underserved Communities

HTTP Members

Allianza Dominicana

ASPIRA Association

*Association for the Advancement of
Mexican Americans*

*Cuban American National
Council*

Dialogue on Diversity

Hispanic Federation

Hispanic Information Television Network

*Interamerican College of Physicians and
Surgeons*

*Labor Council for Latin American
Advancement*

*Latinos in Information Sciences and
Technology Association*

MANA, A National Latina Organization

*National Association of Hispanic
Publications*

*National Conference of Puerto Rican
Women*

National Hispanic Council on Aging

National Hispanic Medical Association

National Puerto Rican Coalition

The Hispanic Institute

U.S.-Mexico Chamber of Commerce

U.S. Hispanic Chamber of Commerce

Hispanic Technology and Telecommunications Partnership

90 Pennsylvania Avenue SE

Washington, DC 20003

T: (202) 503-HHTTP

F: (202) 566-8285

Website: www.httponline.org

Jason A. Llorenz, Esq.
Executive Director

May 31, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket No. 11-65

Dear Commissioners:

The Hispanic Technology and Telecommunications Partnership (HHTTP) is a coalition of national Hispanic organizations working to increase awareness of the impact of technology and telecommunications policy on the U.S. Hispanic community.

HHTTP members are nonprofit organizations that support the social, political, and economic advancement of 51 million Americans of Hispanic descent in the mainland and Puerto Rico, by facilitating access to health care, quality education, economic opportunity, technology tools, and resources. In its 12 year history, HHTTP has emerged as the leading Hispanic voice on telecommunications and technology policy issues, especially surrounding the digital divide and telecommunications reform.

Our members and leading community advocates who represent a broad and diverse spectrum of community interest across the country are supporting the proposed AT&T/T-Mobile merger given its public interest benefits. From small business owners to labor activists, Latino state legislators to Latino doctors, academics and educators to journalists and publishers, civil rights advocates to Latino engineers, Members of Congress and a former FCC Commissioner to rural advocates and Governors representing states with a growing number of Latinos, it is clear this acquisition stands to benefit millions of Latinos across the country.

In fact, one of the most respected and knowledgeable voices on telecommunications policy, The Honorable Henry Rivera, former FCC Commissioner — the first Latino Commissioner in the agency's history — wrote, "Given that minority communities rely on wireless services as their primary means for Internet access, the merger should offer these communities greater accessibility to reliable services." Policymakers, therefore, "shouldn't miss an opportunity to provide solutions that could help ensure more minorities have access to better service."

The leading Latino advocacy organizations representing millions of Latinos through membership, councils, affiliates and service providers, agree that this

merger would be game-changing for the Hispanic community in driving ubiquitous deployment and universal adoption of high speed wireless broadband and spurring domestic investment necessary for continued job growth. It will also deliver the power of broadband to small businesses across the country, enabling these engines of economic growth and job creation in all parts of the country to expand their reach. In addition, this merger represents the biggest opportunity for Latino workers to come under the umbrella of the largest unionized workforce in the country.

The Hispanic Federation, National Hispanic Medical Association (NHMA), National Hispanic Council on Aging (NHCoA), League of United Latin American Citizens (LULAC), US Mexico Chamber of Commerce, ASPIRA, National Hispanic Caucus of State Legislators (NHCSL), the Labor Council for Latin American Advancement (LCLAA), the United States Hispanic Leadership Institute (USHLI), the National Puerto Rican Coalition, Inc. (NPRC), the US Hispanic Chamber of Commerce (USHCC), the Hispanic Institute, CNC (Formerly Cuban American National Council), Latinos in Information Sciences and Technology Association (LISTA), SER Jobs for Progress National, Inc., The Latino Coalition, The National Conference of Puerto Rican Women, and the Hispanic Leadership Fund among others, recognize the robust public interest benefits and the unique opportunity to enhance Latino empowerment in the country. In addition, this merger will accelerate the deployment of 4G LTE technology across the country, in utilizing scarce spectrum most efficiently even while we await the necessary spectrum reallocation, and in helping to close the digital divide.

Many Latinos have been early adopters of mobile technology and use it every day in their work, in education, and in communicating with family and friends. Yet the country still needs a catalyst to spur greater adoption of broadband, which is the prerequisite to fulfill the ambitious goals of the National Broadband Plan. Latino leaders view the AT&T-T-Mobile merger as a furtherance of those goals.

The merger's transformative power is summed up in the commitment to bring 4G technology to over 97% of Americans, including both urban and rural areas with large concentrations of Hispanics. This new ability to connect at high speeds helps to equalize opportunities. Many people will have a new opportunity to leap a generation or more of technology to move to 4G and discover applications that can enrich all aspects of their lives.

While we understand that there are some voicing opposition or concerns, we would urge you to consider the perspective of one of the Latino community's leading voices Dr. Juan Andrade, President & CEO of the US Hispanic Leadership Institute and one of only two Latino recipients in history of a Presidential Medal, as filed with the FCC, "I am writing in support of the proposed merger of AT&T and T-Mobile. Like you, I too have heard that the merger will have a devastating impact on consumers, promote anti-competitive behavior, and result in higher prices; that the merger will be bad for business, bad for innovation and bad for workers. We've heard this all before - when SBC was acquiring Ameritech, when AT&T was merging with SBC, and so forth. And what have we seen? We've seen just the opposite. The Federal Communications Commission's own data show that these concerns proved unfounded as consumers benefited from tremendous innovation and competition in the wireless space, all while seeing wireless voice and data prices drop."

While the FCC will consider all sides, if history and the facts are any indication, it is clear to us that the proposed transaction will serve the public interest.

Beyond the aforementioned benefits, we recognize AT&T's leadership in diversity best practices. As Janet Murguia, President & CEO of the National Council of La Raza stated, "AT&T and its predecessor companies have been pioneers in this field when it comes to the Hispanic community. Their relationship with the community dates back decades. It is therefore not surprising that AT&T has one of the most diverse and representative workforces in the industry, including at the highest levels of the company. In addition, we note that according to the National Minority Supplier Development

Council, AT&T has one of the strongest minority procurement records of any company, regardless of industry. It is little wonder then that Hispanic Business, DiversityInc, and other magazines have bestowed numerous "best of" awards on AT&T in recent years" she continues, "as the FCC and the Department of Justice move forward in this process, we hope and expect that improving diversity will be a cornerstone of whatever they ultimately decide".

Further, we applaud AT&T's commitment to continue its leadership position in corporate social responsibility, and enhance their existing commitments to adoption and supplier diversity through additional programs and partnerships.

On behalf of millions of Latinos represented by the leading national Hispanic organizations who have expressed their support for the AT&T/T-Mobile merger, I urge you to take the community's collective voice of support for this transaction into consideration as you review the merger and help to realize the nation's goal of universal broadband.

Sincerely,



Jason A. Llorenz, Esq.
Executive Director
**Hispanic Technology and
Telecommunications Partnership (HTTP)**
90 Pennsylvania Avenue SE
Washington, DC 20003
T: (202) 503-HTTP
F: (202) 566-8285
Website: www.httponline.org

POLITICO

How wireless policy affects minorities

By: Henry M. Rivera

May 26, 2011 04:41 AM EDT

Spectrum fuels the wireless industry and the prospect of not being able to obtain enough of this finite resource should worry us. As a nation, we are at a critical crossroads — where choosing the wrong path threatens the livelihood of our ever-expanding community of wireless users.

In coming months, our policymakers' course of action is likely to affect the U.S. digital future. These airwaves are worth billions to wireless companies and are vital to the success and sustainability of the wireless industry and all consumer technologies it offers. Think of spectrum as the lifeblood of wireless technology.

Given the explosion in wireless consumer demand for smartphones and other devices that depend on spectrum, wireless providers need more spectrum if consumers want to continue to stream videos, pay bills and get access to a range of services on their wireless devices.

Cisco estimates that 50 billion devices will be connected to the nation's wireless network by 2020, as smartphones gain in popularity, and more and more everyday items are mobilized for consumer ease and efficiency.

The 2010 census showed that minority populations, Latinos in particular, are growing rapidly. Pair this with the fact that a high percentage of minorities depend on wireless service for Internet access, and the picture is clear: Consumer demand for wireless services will only grow.

Latinos and African-Americans lead the way in mobile broadband use — subscribing at a rate of 53 percent and 58 percent, respectively, and both groups will be disproportionately affected if providers fail to keep up with the demand for more spectrum.

This need is not some myth created by the wireless industry to justify amassing valuable spectrum, and its ramifications go well beyond the Beltway. The Federal Communications Commission has persuasively laid out the spectrum crunch facing the nation. Numerous companies, network engineers, wireless experts, analysts and even the White House have all testified about the threats associated with the looming problem — consistently presenting solid information supporting the detrimental effects of not having enough spectrum.

Only an extremely small fraction of naysayers questions the realities of the crunch.

The FCC, Congress and industry stakeholders have been trying to reach consensus solutions so that this crucial resource is more effectively and efficiently utilized by spectrum holders. As FCC Chairman Julius Genachowski said last month, "We can't afford to wait to allocate more spectrum."

The wireless industry is also looking into market-based solutions. AT&T's recently announced merger with T-Mobile is one example. The near future means a fully connected world, and to get there, both long and short-term solutions need to be considered.

AT&T told the FCC that, if the merger is approved, the company will deploy next-generation 4G Long Term Evolution wireless networks — lightning-fast mobile Internet speeds comparable to wired broadband in the home — to more than 97 percent of Americans. AT&T said it can provide higher-quality and faster service while also closing coverage gaps. Given that minority communities rely on wireless services as their primary means for Internet access, the merger should offer these communities greater accessibility to reliable services.

AT&T also predicts that the merger can create opportunities and benefits for minorities across important sectors, including health care, education and the growth of small and minority-owned businesses — where

Latinos are leading the way.

When considering market-based solutions like the merger, or other alternatives for securing adequate spectrum availability, policymakers need to consider the effects carefully. But they shouldn't miss an opportunity to provide solutions that could help ensure more minorities have access to better service.

All communities can gain from a healthy wireless industry that will offer widespread options to the best technologies, create jobs through infrastructure upgrades, increase construction and deployment projects and foster online business opportunities — while allowing everyone to participate in a digitally connected society.

Henry M. Rivera served as the first Latino commissioner on the FCC. He now serves as chairman of the Minority Media and Telecommunications Council and chairman of the FCC's Advisory Committee on Diversity in the Digital Age. He is also a partner at Wiley Rein.



© 2011 Capitol News Company, LLC

For Immediate Release
April 25, 2011

Contact:
Galen Munroe, (202) 624-6911
gmunroe@teamster.org

TEAMSTERS SUPPORT PLANNED MERGER OF AT&T AND T-MOBILE

AT&T Acquisition Positive Step for T-Mobile Workers

(WASHINGTON, D.C.) – Last week, AT&T and Deutsche Telekom AG announced that the two entities had reached an agreement for AT&T's acquisition of T-Mobile. The Teamsters Union supports the joining of these two mobile communications providers as a positive sign that T-Mobile workers will soon enjoy the same protections and bargaining power as the 42,000 unionized workers at AT&T.

A strong partnership already exists between the Communications Workers of America (CWA) and the German trade union ver.di. The two unions formed a joint organization called TU that represents T-Mobile workers in both Europe and the United States.

"This merger not only represents a commitment by AT&T to take the necessary steps toward expanding and modernizing America's network infrastructure, but also means that hundreds of T-Mobile workers will work for a management team that maintains full neutrality toward union membership," said Teamsters General President James P. Hoffa. "I have no doubt in my mind T-Mobile's workers will only benefit from their association with the CWA and the union's president, Larry Cohen."

Founded in 1903, the Teamsters Union represents 1.4 million hardworking men and women throughout the United States, Canada and Puerto Rico. Visit www.teamster.org for more information.

TEAMSTERS UNION LOCAL NO. 190

Affiliated with the International Brotherhood of Teamsters

P.O. BOX 50969 BILLINGS, MONTANA 59105

Joe Dwyer
Secretary-Treasurer &
Business Representative

437 Kuhlman Drive
Telephone (406) 248-2658
FAX (406) 248-1503
teamsters190@teamsters190.com
www.teamsters190.com



May 24, 2011

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

Dear Commissioners:

I am writing to express my support for AT&T's merger with T-Mobile. As a consumer and as a Teamster, I see many benefits.

Here in Montana, there's a lot more land than people. Low population density means that it is expensive to supply broadband coverage to the whole state, and T-Mobile has shown that they are reluctant to invest in or expand their system. AT&T, on the other hand, is planning to use the T-Mobile merger as a jumping-off point to much more comprehensive coverage. We all know how broadband access to the Internet can broaden opportunities for business and education, and Montana can use that kind of leverage.

As a Teamster, I can also see how better broadband access will help my fellow workers. Many Teamsters, such as truck drivers, law enforcement employees, and school bus drivers are frequently on the road. This merger will mean increased access to communications and applications that make their work more efficient. Not to mention, more wireless broadband coverage means better communications during an emergency. Of course, all Montanans will see these benefits, not just Teamsters.

As a union member, I am also happy about the benefits to T-Mobile workers. AT&T is neutral toward union membership, and T-Mobile workers who see the advantages of collective bargaining will appreciate the opportunity to organize once the merger goes through.

I support AT&T's merger with T-Mobile, and I hope you will, too.

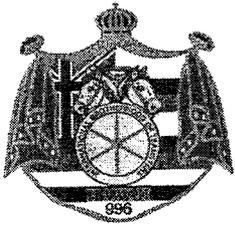
Sincerely,

A handwritten signature in black ink, appearing to read "Jim Larson".

Jim Larson
Political Coordinator
Teamsters 190

JL:dd

CC: Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



HAWAII TEAMSTERS AND ALLIED WORKERS, LOCAL 996

Affiliated with the International Brotherhood of Teamsters

1817 Hart Street
Honolulu, Hawaii 96819-3205

Telephone: (808) 847-6633
Fax: (808) 842-4575

May 24, 2011

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

RE: *In the matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or transfer control of licenses and authorizations (WT Proceeding No. 11-65)*

Dear Commissioners:

This letter is in response to the call for comments on the proposed AT&T/T-Mobile merger. The outcome of this merger will be good for workers and families here in Hawaii and Local 996 supports it enthusiastically.

As you may know, this merger is expected to expand and enhance the existing network infrastructure and in doing so, will make high-speed broadband available to virtually all Americans, including to those living in smaller or rural communities. This is great news for consumers, businesses, and workers.

For workers in Hawaii, the increased availability of reliable, high-speed wireless will mean better coverage and improved safety for our drivers as well as better on-the-job communication between workers. One of our major employers is the movie industry, and an enhanced network will mean faster service and more capabilities for their crews, which will increase efficiency, helping our entire community in the process.

High-speed broadband also brings opportunities for professional and educational advancements, distance learning and improved job training, and many other possibilities for workers and job-seekers. This access will assist us with our outreach and community-building efforts and will be an essential tool that helps workers educate themselves about their rights, available services, and promotion opportunities.

Advanced communications technology has the power to unlock potential and reveal possibilities for workers everywhere, and faster broadband access is the way we all get there. All people should have equal access to this technology and to the future opportunities it delivers as well as to the innovation it drives. Please support this merger on behalf of workers here in Hawaii and elsewhere. Thank you for your careful consideration of this matter.

Sincerely,

Millie Downey
Secretary-Treasurer

cc: Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES, AFL-CIO

Statement from James A. Williams, General President, International Union of Painters and Allied Trades

Office of
James A. Williams
General President
Director of Organizing

Hanover, Maryland, June 2, 2011 -- The International Union of Painters and Allied Trades (IUPAT) supports the merger between T-Mobile and AT&T because of the positive impact it will have on workers, businesses and the broader U.S. economy. This merger will help move America ahead by delivering the economic benefits of advanced broadband to more than 97 percent of the population and providing the option of union membership to 20,000 men and women in the T-Mobile Workforce.

410-564-5910
1-800-437-7347
Fax 1-866-656-4124

Advancing technology has made access to wireless broadband a fundamental requirement for economic growth and job creation. As a result of this merger, AT&T is committing an additional \$8 billion investment in wireless broadband infrastructure. This is the kind of private investment we need to accelerate the pace of national economic recovery. Construction of this expansion will provide good jobs in the short-term, and the availability of the technology will enable the creation of new jobs in the long-term.

ONE VOICE

Representing
Protective and Decorative
Coatings Applicators •
Wallcoverers • Drywall Finishers
• Painters • Decorators • Scenic
Artists • Designers • Civil Service
Workers • Shipyard Workers •
Maintenance Workers • Building
Cleaners • Metal Polishers
• Metalizers • Public Employees •
Clerical Workers • Professional
Employees • Security Guards
• Safety Engineers • Bridge
Painters • Riggers • Tank Painters,
Marine Painters • Containment
Workers • Waterblasters •
Vacuum Cleaners • Sign
Painters • Sign and Display
Workers • Bill Posters • Convention
and Show Decorators and
Builders • Paint Makers •
Glaziers • Architectural Metal
and Glass Workers • Sandblasters
• Lead Abatement Workers •
Flooring and Decorative
Coverings Workers • Journeyman
and Apprentice Commercial,
Industrial, Highway, Residential
Construction Workers

Additionally, this build-out will cover many traditionally underserved areas, so communities and families which have previously not had access to current technology will be able to benefit from 4G LTE, the next generation of high speed broadband. They will not be left stranded on the wrong side of the digital divide.

And finally, we cannot overstate the importance the potential impact this merger will have on the quality of life for T-Mobile employees. At a time when the right to collective bargaining is under attack in some political circles, this merger will give 20,000 T-Mobile employees the option to choose representation in the workplace and the associated benefits of collective bargaining and workplace protection.

The IUPAT believes the merger is the right move at the right time for workers, families and consumers and looks forward to expeditious review and approval by the appropriate regulatory agencies.

About the IUPAT

The International Union of Painters and Allied Trades represents men and women in the United States and Canada who work in the Finishing Trades - commercial/industrial painting, glazing/glasswork, drywall finishing, floor covering installation, sign/display/tradeshows, among other crafts. Learn more about the IUPAT by visiting www.IUPAT.org, www.Facebook.com/IUPATfan, @GoIUPAT on Twitter.

ONE AGENDA

7234 Parkway Drive
Hanover, MD
21076

##

Organizing Since 1887





Intertribal Agriculture Council

100 North 27th Street, Suite 500, Billings, Montana 59101-2054 (406) 259-3525

May 25, 2011

Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: (WT Docket No. 11-65) In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations.

Dear Chairman Genachowski:

The Intertribal Agricultural Council was founded in 1987 to pursue and promote the conservation, development and use of our agricultural resources for the betterment of Native Americans. We work closely with federal agencies and Tribal governments to support individual Indian producers and Tribal enterprises. The IAC has over the last decade become recognized as the most respected voice within the Indian community and government circles on agricultural policies and programs in Indian country.

We are writing today to encourage you to approve the proposed AT&T-T-Mobile merger because it will bring direct benefits to the Indian agricultural producers and Tribal agencies with whom we work. If the merger is approved, AT&T has promised to bring high-speed wireless Internet connections to a much larger section of the country faster than it would be able to do if the merger is not approved. This includes many areas in Indian Country that are not currently served or are served only through slower, less reliable systems.

As the FCC recognized in the National Broadband Plan, "Broadband and the Internet make it possible for small businesses to reach new markets and improve their business practices. They have also become a critical pathway for individuals to gain skills and access careers." This is exactly the vision we have for Indian agricultural producers and why it is so critical that the AT&T-T Mobile merger be approved. No one else has promised these kinds of service improvements, including high-speed broadband deployment, to currently underserved areas in Indian Country. Once our farmers and Tribal agencies have access to high-speed broadband, they can monitor market conditions to determine when and where to sell their products for the highest profit, monitor weather

conditions in real time, and participate more fully in agricultural extension and education programs remotely. They will be able to sell to new markets, build national brand awareness, and be able to grow and expand their businesses, which will add much-needed employment in hard-hit Native communities. But all these benefits can only come if there is real access to high-speed wireless broadband, and for the foreseeable future, that can only come if the AT&T/T-Mobile merger is approved.

This merger is truly a unique opportunity to benefit Native American agriculture and Indian Country as a whole and to make the vision of the National Broadband Plan a reality. This merger will help fulfill our mission to promote the Indian use of Indian resources for the benefit of Indian people. If the merger is not approved, we are concerned that Indian Country and the people we serve will be left behind irrevocably.

Sincerely,



Ross Racine
Executive Director

CC: Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



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

May 24, 2011

WT 11-65: *In the matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or transfer control of licenses and authorizations*

Dear Chairman Genachowski and Commissioners:

As an organization dedicated to researching, advocating for, and implementing strategies that support business growth, Jobs for New England NOW is well versed in the benefits of expanding broadband coverage to support our goals. Boosting America's wireless infrastructure and service would promote job growth, attract new businesses, help small businesses compete, and create many benefits for citizens across the region. The region of New England and the people within it would reap many rewards from AT&T's merger with T-Mobile.

As the Executive Director for Jobs for New England Now I wouldn't be doing my job if I did not write to you, the policymakers, and express the ways in which the AT&T merger would benefit the business climate in New England. The basics of this merger are that coverage will be expanded to almost all Americans, the improved speed and quality of 4th Generation LTE service will become the norm, the private sector will be making huge investments into the economy, and capacity for new technology will increase. While there are many ways that I can work to promote businesses in my area, very few opportunities like this merger come along that provide the ability to introduce widespread change in the region's businesses.

Please consider the many merits of this merger during your review. The businesses and people of New England have great potential to excel with the new technological capacity. Thank you for taking the time to review this letter and I look forward to hearing your decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Moran".

Paul Moran

CC:
Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn

Commissioner Michael Copps
Commissioner Robert McDowell

Dear Chairman Genachowski,

Juniper Networks is a leading provider of networking and security products used by service providers as well as enterprise customers, including nearly all of the world's largest telecommunications companies, cable operators, and internet content providers.

Cloud computing and mobile Internet are driving enormous increases in both the complexity and quantity of network traffic. Businesses and consumers are increasingly using smart phones, tablets, laptops and other mobile devices to wirelessly connect through the Internet to content, business applications, healthcare, government services and to each other, and they are demanding network access to content and applications, whenever, wherever and however they choose. As a result, demand for wireless broadband is dramatically increasing.

We are concerned that the rate of increase in network traffic will soon exceed the rate of network capacity growth and the historic levels of infrastructure investment by service providers. Maintaining a robust network (both wired and wireless) capable of meeting the needs of government, business and consumers is essential to our national economy, technology innovation and global competitiveness.

To address these challenges, we have previously written to the Commission that we believe that government regulations must provide sufficient flexibility of possible business models by service providers and content providers to promote the necessary investment and innovation in network infrastructure.

Similarly, we believe that these network capacity challenges and the investment and scale required to meet them, will likely drive and require greater economies of scale and potential consolidation of infrastructure providers. Given the network capacity challenges, policymakers must give meaningful consideration to AT&T's acquisition of T-Mobile as a means of addressing near term wireless broadband capacity needs.

AT&T's acquisition of T-Mobile represents a near term means of addressing the rising consumer and business demand. For example, the merged company will be able to leverage a larger network of cell sites allowing greater reuse of spectrum and increasing the wireless broadband capacity of the

network. We have been informed by AT&T that it will migrate the T-Mobile network to LTE technology and offer LTE-based wireless broadband to 97.3 percent of the U.S. population.

For these reasons, we respectfully submit that the FCC seriously weigh the benefits of this merger and approve it. Such action will help to meet the near term wireless broadband needs of consumers and businesses.

Sincerely,

Mitchell L. Gaynor
Executive Vice President and General Counsel



Kern County Fire Fighters Union, Inc.

Representing Professional Fire Fighters of Kern County
INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS NO. 1301



May 25 2011

President

Derek P Robinson

Secretary/Treasurer

Sam Scoles

Past President

Clay Youree

Vice Presidents

Tim Holliday

Allen Montes

Chris Stroub

Directors

Dean Boller

Mark Palomo

Bryan Rico

Mark Ratekin

Ben Fowler

Nick Herndon

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

Re: WT Docket 11-65

Dear Chairman Genachowski,

On behalf of the Kern County Fire Fighters Union I would like to voice our support for the AT&T-T-Mobile merger. Public safety is becoming increasingly dependent on wireless networks when responding to emergencies and helping keep citizens safe. We feel that the AT&T-T-Mobile merger will help meet the public safety needs of citizens and first responders.

As Californians become more reliant on wireless technology, it is becoming an important way to contact first responders in cases of emergency. First responders need to be sure that wireless networks have the capacity to meet citizens' needs and first responders' needs, allowing them to respond as fast as possible. The AT&T-T-Mobile merger will help create a stronger, more reliable, and widespread network, which will better connect first responders and citizens leading to safer communities.

This AT&T-T-Mobile merger will also benefit rural communities. With the expanded coverage area, rural communities will be able to stay better connected with first responders. In places where the nearest fire station or hospital might be miles away, the faster a citizen can contact first responders, the faster help can arrive. This merger will help improve safety for rural communities and their citizens.

The Kern County Fire Fighters Union urges the Commission to approve the AT&T-T-Mobile merger. It will allow for faster response times, a more reliable connection, and it will help save the lives of more citizens. While we understand the need for the Commission to conduct a full review, we urge you to quickly approve this merger to help save and protect more American lives.

Sincerely,

Derek Robinson, President
Kern County Fire Fighters

CC: Commissioner Mignon Clyburn
Commissioner Michael Capps
Commissioner Robert McDowell
Commissioner Meredith Attwell Baker

*Affiliated with California Professional Firefighters * State Federation of Labor * A.F.L.—C.I.O.*

Phone (661) 864-1301 * FAX (661) 864-1324 * E-Mail admin@kerncountyfirefighters.org
3555 Landco Dr., Ste. A Bakersfield, CA 93308

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

May 26, 2011

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of Licenses and Authorizations

Dear Chairman Genachowski:

As our economy recovers, technology start-ups will help lead the way in creating new jobs and reviving struggling communities. To get off the ground, these growing companies rely on initial financial backing from a small community of venture capital firms. According to the National Venture Capital Association, each year, the venture capital community generates roughly \$3 trillion in revenue, puts more than 12 million people to work, and accounts for more than one-fifth of the total economy. From the mainframe to the PC to the microchip and the Internet, venture capitalists are an integral part of an economic model that has proven to be successful time and time again.

In our estimation, one of the greatest opportunities for future economic growth involves wireless broadband and mobile devices. The rise of smartphones like the iPhone and Android devices has created a powerful new computing platform on which many start-ups are being built. This growth opportunity faces a challenge, however, with the looming prospect of "spectrum exhaust": overcrowded networks will be unable to provide the bandwidth required for the exciting new applications and other innovative ideas that are now being developed by tomorrow's successful companies.

We encourage policymakers to continue their efforts to free up the spectrum necessary to enable all network providers to construct next-generation broadband networks. In AT&T's and T-Mobile's merger applications, however, the companies highlight the near-term difficulties that carriers currently face: market-specific capacity issues coupled with longer-term spectrum needs that will delay or prevent the deployment of these next-generation wireless broadband networks. By combining the physical infrastructure and spectrum positions of the two companies, the merged entity is targeting deployment of a 4G LTE broadband infrastructure to more than 97% of the United States population in a faster timeframe than either firm could achieve on its own. This commitment would help millions of Americans throughout the United States gain access to a network that can support innovative technologies, applications and devices. The technology start-ups we work with will be a key beneficiary of this more efficient

and robust national wireless network. We are in favor of the Commission approving this transaction.

Thank you for your consideration.

Matthew J. Murphy, Partner, Kleiner Perkins Caufield & Byers



CC:

Commissioner Meredith Attwell Baker

Commissioner Mignon Clyburn

Commissioner Michael Copps

Commissioner Robert McDowell



April 27, 2011

Marlene Dortch, Secretary
The Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

The Latino Coalition is pleased to offer the attached comments that explain our support of the AT&T-T-Mobile merger announcement, given the importance of wireless communication in the Latino community.

We would appreciate inclusion of this document in the FCC's WT: 11-65 docket.

Sincerely,

Hector Barreto
Chairman
The Latino Coalition

CC:

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Rick Kaplan, Chief Counsel and Senior Legal Advisor for Chairman Genachowski
John Giusti, Chief of Staff and Legal Advisor for Wireless, Public Safety and International for Commissioner Copps
Angela E. Giancarlo, Chief of Staff and Senior Legal Advisor, Wireless & International for Commissioner McDowell
Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety for Commissioner Clyburn
Charles Mathias, Senior Legal Advisor, Wireless, International and Public Safety Issues for Commissioner Baker



The Latino Coalition Recognizes Potential of AT&T-T-Mobile Merger To Bring Advanced Wireless Technologies to More Americans

TLC reinforces importance of opportunities for Latino businesses and communities provided by access to next-generation networks

WASHINGTON, April 8, 2011 /PRNewswire-USNewswire/ -- The proposed merger of AT&T and T-Mobile holds great promise for all Americans, and especially those of Hispanic heritage.

First, by making it possible to accelerate the deployment of 4G technology and making it available to 95 percent of America, this transaction will move us closer to the Administration's goal of spreading advanced wireless service to every part of our country. That is good news for Latinos, who have enthusiastically embraced wireless technology as one way to enjoy the benefits of Internet communications.

In addition, the work required to build out an expanded 4G network will create new business opportunity for the Latino suppliers and vendors who already partner with AT&T and also will open the door for new business partners as well. AT&T has an outstanding record of teaming with minority-operated businesses and has worked with TLC in the past years in its B2B Procurement Matchmaking program. This year's B2B Procurement Matchmaking will take place in Washington DC this upcoming May during our America's Small Business Summit.

Given the advanced capabilities of 4G service of additional speed and reliability it will mean new economic opportunities for all small businesses across America. By enabling expanded and higher quality connectivity among businesses and their customers, the acquisition of T-Mobile by AT&T should set off a cycle of investment and other business activity that will help support economic growth that helps all Americans.

About the Latino Coalition

The Latino Coalition (TLC) was founded in 1995 by a group of Hispanic business owners from across the country to research and develop policies relevant to Latinos. TLC is a non-profit nationwide organization based in CA, with offices in Washington, DC and Guadalajara, Mexico. TLC was established to address policy issues that directly affect the well-being of Hispanics in the United States. TLC's agenda is to develop initiatives and partnerships that will foster economic equivalency and enhance overall business, economic and social development of Latinos. Visit: www.thelatinocoalition.com.



Paul Shelgren, Interim Chief of Police
Lincoln Police Department
770 7th Street
Lincoln, CA 95648

May 19, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

Re: WT Docket 11-65

Dear Chairman Genachowski,

The safety of our nation's citizens is always my greatest concern. As Chief of Police for the Lincoln Police Department in California, I am keenly aware that public safety requires reliable wireless technology. With so many Americans cutting the cord on home phones, wireless has become their only means of contacting first responders in an emergency. These first responders, in order to act more accurately and efficiently, require wireless services that have the capacity to meet their needs.

When wildfires and flooding ravage California, public safety networks can become damaged and unusable. However, many commercial networks have the durability and capability essential for emergency responders. The AT&T/T-Mobile merger is a way to achieve the same durability and capability for emergency responders who could now communicate much quicker and more efficiently with their control centers. Not only would the merger positively impact emergency responders, but the new company plans to expand LTE coverage to over 97 percent of the population, covering more towns and small cities than ever before.

A wider coverage map with greater network capacity will help save the lives of more people and meet the needs of America's first responders. I urge you to support the merger of AT&T and T-Mobile to help protect more American lives.

Sincerely,

Paul Shelgren, Interim Chief of Police
Lincoln Police Department

CC:
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Meredith Attwell Baker

770 7th Street

◆ Lincoln, CA 95648 ◆

(916) 645-4040 ◆

FAX (916) 645-8940

STATEMENT OF PUNEET SINGAL (L&T INFOTECH)

on Proposed Merger of T-mobile with AT&T

To whomsoever it may concern

1. I am the Manager of Finance Accounts and Administration at L&T Infotech. L&T Infotech's parent company is Larsen & Toubro Ltd. L&T Infotech is a global IT service and solutions provider. It is one of the world's largest IT service providers and has clients worldwide. I am also responsible for managing the technological aspects of the company.
2. We purchase various wireless services that include data cards, wireless voice and data services, and mobile devices (including Black Berries) purchased primarily through a CL (corporate liable) account. We choose wireless providers by evaluating providers' contract terms, Services, Pricing, and overall value.
3. The bulk of our wireless data services are provided by T-Mobile, AT&T and, to a lesser extent, Verizon and Sprint.
4. In my view, the wireless market in the United States is competitive, and there are benefits possible through consolidation. The proposed transaction will likely result in fewer dropped calls and more overall reliability and better Coverage, which translates to more connectivity for my firm's critical business users.
5. I support the proposed transaction, because I am hopeful that the proposed transaction will provide an opportunity for AT&T to expand its spectrum and increase service quality. This would provide value to our firm as well as AT&T's other business customers.

Date: _06/04/2011_



Puneet Singal



EXECUTIVE BOARD

CHAIRMAN
JEFFREY BERNSTEIN
THE ARCHSTONE GROUP

PRESIDENT
NANCY PLOEGER
MCC

VICE PRESIDENT/GENERAL COUNSEL
RONALD I. PALTROWITZ
LAW OFFICES OF
RONALD I. PALTROWITZ

VICE PRESIDENT/TREASURER
SUNITA BAJAJ
METLIFE

VICE PRESIDENT/SECRETARY
TERRENCE MARTELL
WEISSMAN CENTER FOR
INTERNATIONAL BUSINESS,
BARUCH COLLEGE

VICE PRESIDENTS

JOSEPH KIRK
WELLS FARGO
PETER MELORO
CON EDISON

LOUISE SHOHEIT
BSC TRAVEL INC.

DON WINTER
ENCOMPASS MEDIA GROUP

AFFILIATES

MCC FOUNDATION
MCC COMMUNITY
BENEFIT FUND

EXECUTIVE OFFICE

1375 BROADWAY, 3RD FLOOR
NEW YORK, NY 10018

O: 212 473 7875
F: 212 473 8074

INFO@MANHATTANCC.ORG
WWW.MANHATTANCC.ORG

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

May 31, 2011

Re: WT Docket 11-65

Dear Chairman Genachowski:

With 10,000 members and subscribers, we represent the voice of over 100,000 companies in Manhattan and partner with over 300 diverse business organizations in the city. Our members are part of one of the largest constituencies in the country representing approximately 1.6 million U.S. employees and approximately 4.5 million employees globally. This large community relies on high-speed broadband access to compete in the ever-changing business world. We know that the AT&T-T-Mobile merger will supply our state with the connectivity we deserve.

Those who live, work and do business in Manhattan depend not just on high-speed broadband connectivity, but on mobile broadband connectivity, as well. Our members, their customers, and our residents have integrated their mobile devices into every part of their day-to-day lives.

We believe that the AT&T-T-Mobile merger will make our great city even stronger. Our existing mobile broadband coverage will only improve, making Manhattan an even more attractive place to live, work, start or grow a business, or raise a family.

The Manhattan Chamber of Commerce is meeting the challenges of the 21st century -- a time when technology is, again, changing the face of business. As relevant today as it was 84 years ago, the Chamber is at the forefront -- supporting entrepreneurs as they do business in this exciting time in New York. For this reason, we are a leading supporter of the AT&T-T-Mobile merger and urge you to support our cause.

Yours truly,

Nancy Ploeger
President

CC: Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

Shari L. Buck
Mayor



Your Community of Choice

2200 Civic Center Drive, Suite 100 • North Las Vegas, Nevada 89030
Telephone: (702) 633-1007 • Fax: (702) 633-1339 • TDD: (800) 326-6868
www.cityofnorthlasvegas.com

May 25, 2011

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C.

re: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations (WT Docket No. 11-65).

Dear FCC Commissioners:

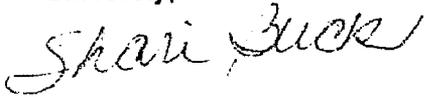
Before the Commission, in Docket No. 11-65, you have the opportunity to approve of a business merger that will tremendously benefit many communities throughout Nevada and the City of North Las Vegas. As the Mayor of this city I have personally investigated the positive effects of the AT&T/T-Mobile merger and have outlined them for you here today.

1. This merger will expand wireless broadband networks and improve existing networks. As a result of this merger, AT&T will expand their 4G network to cover 55 million more Americans than previously planned, bringing the total up to more than 300 million Americans.
2. The evolution of technology will benefit should you approve of this merger. The wireless industry in America is very innovative and expanding this state of the art broadband coverage to nearly the entire country will continue the trend of technological advancements and improvements. These advancements will be felt in nearly every household in Las Vegas and the United States.
3. The proposed merger also has the potential to spur economic development. AT&T has personally pledged to invest an additional \$8 billion into the industry to roll out a more expansive network. This will go a long way towards creating jobs and the network that is established will benefit many different industries and small businesses that are already in operation.

Julius Genachowski, Chairman
Federal Communications Commission
Page 2

This merger has the ability to connect nearly every American citizen to superfast and reliable broadband. Through this, AT&T will be creating jobs and investing in our economy. I see no truly worthy objection to this transaction, considering that it will benefit the City of North Las Vegas as well as hundreds of millions of Americans. Please keep these facts in mind when considering the matter before you.

Sincerely,

A handwritten signature in cursive script that reads "Shari Buck". The signature is written in dark ink and is positioned to the right of the typed name.

Shari L. Buck
Mayor



CITY OF ATLANTA

KASIM REED
MAYOR

55 TRINITY AVENUE, S.W.
ATLANTA, GEORGIA 30303-0300
TEL (404) 330-6100

May 18, 2011

Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attention: Chairman Julius Genachowski

Re: Applications by AT&T Inc. ("AT&T") and Deutsche Telekom AG to obtain the consent of the Federal Communications Commission ("FCC") for the transfer of control of the licenses and authorizations held by T-Mobile USA, Inc. and its subsidiaries ("T-Mobile") to AT&T, WT Docket No. 11-65 (such proposed transfer, the "Transaction")

Dear Chairman Genachowski:

As Mayor of the City of Atlanta and Chair of the Transportation and Communications Committee for the U.S. Conference of Mayors, I support approval of the Transaction and believe the AT&T and T-Mobile merger will (i) promote improved and increased broadband access to millions of Americans, (ii) foster an environment of technological advancement and innovation, and (iii) facilitate job creation and community investment in cities across the country. As you are aware, the stated mission of the National Broadband Plan is "to create a high-performance America – a more productive, creative, efficient America in which affordable broadband is available everywhere and everyone has the means and skills to use valuable broadband applications." I echo the sentiment of the FCC that universal and affordable broadband access is a high priority for our nation and affirm the Obama administration's goal "to connect every part of America to the digital age." The AT&T and T-Mobile merger would greatly benefit the citizens of Atlanta, home to more than twenty-one thousand (21,000) AT&T employees, and provide much needed broadband access for Georgia's rural and underserved communities.

Based on reports from AT&T and T-Mobile, the combination of the companies' networks will bring new fourth-generation high-speed access to forty-five (45) million more Americans than either network could cover on its own and provide coverage to approximately ninety-seven percent (97%) of the U.S. population. Indeed, as generally stated by a number of national advocacy organizations, this merger has great potential of significantly reducing the economic and technological barriers that exist in underserved, rural and low-income urban areas. The families, business communities and educational institutions of Atlanta are greatly enriched through access to cutting edge technology and faster broadband services as evidenced by Atlanta's recent ranking as the second most wired city in the country by *Forbes Magazine*.

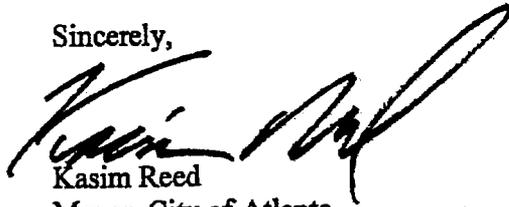
I am committed to support advancements in technology that will encourage connectivity, improve voice and data network performance and close the digital divide still present in major metropolitan areas across the country.

Moreover, it is well-noted that the Transaction provides an effective solution to the country's current capacity crunch by strengthening and expanding our broadband infrastructure. The telecom industry is rapidly evolving and it is critical now more than ever that the United States positions itself as a global leader in the next phase of technological advancement and innovation.

Finally, I am confident that this Transaction will give rise to community investment, job creation and economic growth as AT&T and other telecom companies compete to provide improved services at reduced costs. It is important that today's market efficiencies and growth are allowed for tomorrow's innovation and possibilities.

I respectfully submit this letter for the FCC's consideration and look forward to additional opportunities to provide thoughts and insights into this most important priority for our country.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kasim Reed', with a large, stylized flourish extending to the right.

Kasim Reed
Mayor, City of Atlanta

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)

Applications of AT&T Inc. and Deutsche)
Telekom AG for Consent to Assign or)
Transfer Control of Licenses and)
Authorizations)

) WT Docket No. 11-65

**AMICUS COMMENTS OF THE MINORITY MEDIA AND TELECOMMUNICATIONS
COUNCIL IN SUPPORT OF THE AT&T / T-MOBILE MERGER**

David Honig
President and Executive Director
Joycelyn James
Cathy Hughes Fellow
Jacqueline Clary
John W. Jones Fellow
Latoya Livingston
Earle K. Moore Fellow
Minority Media and Telecommunications
Council
3636 16th St. N.W., Suite B-366
Washington, D.C. 20010
(202) 332-7005
dhonig@crosslink.net

May 30, 2011

TABLE OF CONTENTS

	Page
INTRODUCTION AND SUMMARY	1
I. THE MERGER WILL BENEFIT MINORITY BROADBAND CONSUMERS BY ALLEVIATING THE SPECTRUM CRUNCH AND HELPING TO NARROW THE DIGITAL DIVIDE	4
II. THE MERGER WILL BENEFIT MINORITY TELECOM WORKERS BY EXTENDING AT&T'S DIVERSITY HIRING PRACTICES AND NEUTRALITY TOWARDS UNIONIZATION	11
III. BECAUSE AT&T IS AN INDUSTRY LEADER IN PROCUREMENT, THE MERGER WILL BENEFIT MINORITY BROADBAND ENTREPRENEURS.....	15
CONCLUSION.....	16

INTRODUCTION AND SUMMARY

The Minority Media and Telecommunications Council (“MMTC”), as *amicus curiae* and after extensive due diligence, wishes to express our support for the proposed AT&T / T-Mobile merger.¹

MMTC has fought hard over the years to secure equal opportunity for minorities in the media and telecommunications spaces. It is through this prism that we approach the proposed merger and respond to the FCC’s public notice.² Since our founding 25 years ago, MMTC has not endorsed a merger. We have been, and continue to be, a leading opponent of ownership

¹ Several other leading civil rights and labor organizations have endorsed the merger. *See, e.g.,* Communications Workers of America, *AT&T/T-Mobile Deal Will Benefit Workers and Build Out Broadband* (Mar. 24, 2011), available at http://www.cwa-union.org/news/entry/att_t-mobile_deal_will_benefit_workers_and_build_out_broadband (last visited May 27, 2011); Statement by AFL-CIO President Richard Trumka on Announced Acquisition of T-Mobile USA by AT&T (Mar. 21, 2011) (“AFL-CIO Mar. 21 Statement”), available at <http://www.aflcio.org/mediacenter/prsptm/pr03212011.cfm> (last visited May 27, 2011); Letter from Hillary O. Shelton, NAACP, to Marlene H. Dortch, FCC, WT Docket No. 11-65 (Apr. 18, 2011) (“NAACP Apr. 18 Letter”), available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021240062> (last visited May 27, 2011); Letter from Hector Barreto, The Latino Coalition, to Marlene H. Dortch, WT Docket No. 11-65 (Apr. 27, 2011) (“Latino Coalition Apr. 27 Letter”), available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021341135> (last visited May 27, 2011); The Hispanic Institute, *The Hispanic Institute Announces Support for Proposed Merger of AT&T and T-Mobile* (Mar. 21, 2011), available at <http://www.thehispanicinstitute.net/node/3690> (last visited May 27, 2011).

² *See* FCC, Public Notice, *AT&T Inc. and Deutsche Telekom AG Seek FCC Consent to the Transfer of Control of the Licenses and Authorizations Held by T-Mobile USA, Inc. and Its Subsidiaries to AT&T Inc.*, DA 11-799 (Apr. 28, 2011). While MMTC does not traditionally or formally participate in merger review proceedings, it submits these comments as an *amicus curiae* friend of the Commission in order to assist the Commission in finding the best public interest justification for its decision. The Commission has long accepted *amicus* filings that would assist the agency in its deliberations. *See, e.g., Peninsula Communications*, 20 FCC Rcd 11408, 11410 (2005).

consolidation.³ Mergers often contain risks of loss of diversity and innovation. And therefore for MMTC to endorse one, the case for the merger must be truly compelling.

As MMTC conducted its thorough due diligence on the issue, we have identified significant public interest benefits that would flow from the merger. MMTC will continue to monitor the evidence filed in this docket and we reserve the right to modify our position if the central premises set out herein prove incorrect as the record is developed. But at the outset, we take this opportunity to highlight three main points about the merger that are relevant to minority communities.

First and fundamentally, the merger will benefit minority broadband consumers by allowing AT&T to address capacity constraints and deploy advanced LTE service to more than 97% of consumers. To date, wireless broadband has been a genuine success story for minority communities and has played a key role in helping to narrow the digital divide. However, this progress is threatened by the looming spectrum crunch and the potential for capacity constraints to drive up prices for consumers and drive down broadband adoption, particularly among price-sensitive minority communities. *We cannot let this happen.* As a democratic society, the nation simply cannot afford to guess wrong and see the digital divide widen – especially at a time when minorities are poised to become the nation’s majority. In today’s digital age, access to high-speed Internet is no longer a luxury—it is a necessary predicate of first-class citizenship, and thus it is a fundamental right for all Americans. By easing capacity constraints, the merger will help avert the spectrum crunch – especially in very large majority-minority markets – and thus alleviate the pressures that could drive prices up, drive down minority adoption, and widen the digital divide. In this way, the merger would buy the nation the time it needs to implement a

³ Brief of Intervenors Minority Media and Telecommunications Council *et al.* *Prometheus*

long-term cure for the spectrum crunch through such mechanisms as spectrum incentive auctions and repurposing of some government spectrum.

In addition, the merger will benefit minority telecommunications workers because AT&T has an extraordinary track record of minority hiring and promotion, diversity best practices, and neutrality towards unionization. Indeed AT&T stands at the top of American industry in its service to minority communities and commitment to diversity best practices. Numerous organizations, including DiversityInc, have consistently ranked AT&T among the very best of all Fortune 500 corporations for its commitment to diversity. Because of AT&T's policies and practices, organizations including the NAACP, AFL-CIO, and the Communications Workers of America have all expressed support for the merger. These organizations have noted that AT&T's acquisition of T-Mobile will allow the company to extend its commitments and best practices to even more telecommunications workers. Whenever AT&T has purchased another company, it has extended these policies and practices to the acquired company and AT&T has stated that it will do so again in this instance. Given AT&T's diversity *bonafides*, minority consumers, telecom workers, and entrepreneurs all stand to benefit from the merger.

Finally, the merger will benefit minority entrepreneurs because AT&T has the strongest minority procurement program in the wireless industry. Last year alone AT&T spent over \$9 billion with minority, women, and disabled veterans business enterprises. The merger promises to extend AT&T's outstanding diversity and procurement record to the T-Mobile assets, and it will create extensive opportunities for diverse businesses to participate in AT&T's buildout of the nationwide LTE network made possible by the merger.

Radio Project v. F.C.C., 373 F.3d 372 (3d Cir. 2004).

By averting the spectrum crunch and thus enabling the nation to continue to close the digital divide, and by enhancing opportunities for minority participation in broadband as employees and entrepreneurs, the merger deserves approval.

I. THE MERGER WILL BENEFIT MINORITY BROADBAND CONSUMERS BY ALLEVIATING THE SPECTRUM CRUNCH AND HELPING TO NARROW THE DIGITAL DIVIDE

The nation is in the midst of one of the most critical transitions we have faced – the historic transformation from the industrial era to a new broadband age.⁴ In this time, affordable, ubiquitous, and universal access to broadband offerings is no longer a privilege—it is a vital prerequisite to first-class citizenship. A central principle of the Commission’s National Broadband Plan is that high-speed Internet access is key to everything from civic and political engagement to education, health care, and employment.⁵ As the Commission aptly put it, “[u]ntil recently, not having broadband was an inconvenience. Now, broadband is essential to opportunity and citizenship.”⁶ “The costs of digital exclusion are high and growing.”⁷

⁴ See *Preserving the Open Internet*, Comments of the National Organizations at 2-3, GN Docket No. 09-191 (Jan. 14, 2010) (“National Organizations’ Net Neutrality Comments”) (discussing the current transition to a digital economy and drawing lessons from the nation’s last major transition from an agriculture to an industrial society); see also David Honig, *The State of Social Justice in Media, Telecom and Broadband* (MMTC 2010) (“State of Social Justice 2010”), available at <http://mmtconline.org/lp-pdf/DHonig%20State%20of%20BBSJ%20AS%20DELIVERED%20071910.pdf> (last visited May 27, 2011).

⁵ See FCC, *Connecting America: The National Broadband Plan* (rel. March 17, 2010) (“National Broadband Plan”); see also *Further Inquiry Into Two Under-Developed Issues In The Open Internet Proceeding*, Comments of the National Organizations at 6, GN Docket No. 09-191 (Oct. 12, 2010) (discussing the National Broadband Plan).

⁶ See National Broadband Plan at 5.

⁷ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, Seventh Broadband Progress Report and Order on

The NAACP's National Board of Directors captured the fundamental nature of broadband in a unanimous 2009 resolution advancing the concept of Digital Equal Opportunity.⁸ The NAACP Board found that without access to broadband “people will be relegated to lives of separate and unequal status as compared to those with access to advanced communication technologies[.]”⁹ By imparting digital citizenship, the resolution stated, “we can avoid yet another generation of second-class citizenship . . . so that we can better educate future generations and close the achievement gap, make healthcare more accessible and affordable for the millions of Americans who lack access to essential medical services, provide new job opportunities for those who previously could not hope for equal opportunities in the workplace, and ensure full voting rights and civic participation.”¹⁰ Concluding, the resolution provided that “broadband Internet access to low-income households, particularly including public housing facilities, is an essential infrastructure item akin to the provision of gas, water or electricity.”¹¹

Despite the fundamental importance of broadband, broadband adoption varies significantly across demographic groups, leaving minority and other socially and economically disadvantaged groups disproportionately on the wrong side of the divide.¹² The digital divide in

Reconsideration, GN Docket N. 10-159, FCC 11-78 (¶4) (rel. May 20, 2011) (“Seventh Broadband Progress Report”).

⁸ NAACP, Resolution to Advance Digital Equal Opportunity (adopted unanimously by the NAACP National Board of Directors, December 17, 2009) (available from MMTTC).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *See, e.g., Preserving the Open Internet*, 24 FCC Rcd 13064, 13098 (¶82) (2009) (“Net Neutrality NPRM”) (discussing the disparity in broadband adoption rates between African Americans and other minority groups on the one hand and the national average on the other); *see also* FCC, News Release, *Broadband Task Force Delivers Status Report On Feb. 17 National Broadband Plan* (rel. Sept. 29, 2009) (stating that “large segments of the population have much lower penetration rates, and adoption varies across demographic groups”).

home broadband adoption is vast: African American broadband adoption stands at only 49%, and Hispanic broadband adoption stands at only 48%, compared to 68% for Whites.¹³ As the FCC stated just two weeks ago, “African-Americans and Hispanics continue to trail Whites in reported adoption of broadband at home by ten and twenty percentage points, respectively.”¹⁴

On the other hand, the wireless sector has been an oasis of opportunity for minorities. Numerous studies show that minority use of wireless broadband outpaces that of White Americans.¹⁵ According to the Pew Internet & American Life Project, while 33 percent of white Americans access the Internet over their cell phones, 46 percent of African Americans and 51 percent of English-speaking Hispanic Americans do so.¹⁶ The Joint Center for Political and Economic Studies reports similar statistics, finding that 50 percent of African Americans and 42 percent of Hispanic Americans access the Internet over cell phones, compared with 30 percent of white Americans.¹⁷ Likewise, 33% percent of African American mobile users and 45% of

¹³ U.S. Department of Commerce, *Exploring The Digital Nation: Home Broadband Internet Adoption In The United States* at 7 (Nov. 2010). A similar study cited by the FCC found that while 63% of all adult Americans have adopted broadband at home, only 46% of African Americans and a mere 40% of Hispanic Americans have broadband at home. See FCC Open Meeting Presentation on the Status of the Commission’s Processes for Development of a National Broadband Plan, at 82 (Sept. 29, 2009) (citing Pew Internet & American Life Project, Home Broadband Adoption (June 2009)).

¹⁴ Seventh Broadband Progress Report at ¶58 n.199.

¹⁵ See, e.g., National Organizations’ Net Neutrality Comments at 10-12 (collecting authorities).

¹⁶ See Aaron Smith, Pew Internet & American Life Project, *Mobile Access 2010* at 16 (July 7, 2010) (available at http://www.pewinternet.org/~media/Files/Reports/2010/PIP_Mobile_Access_2010.pdf (last visited October 11, 2010)).

¹⁷ See Jon P. Gant, et al., Joint Center for Political and Economic Studies, *National Minority Broadband Adoption: Comparative Trends in Adoption, Acceptance and Use* at 36 (Feb. 2010) (“Joint Center Broadband Adoption Study”), available at http://jointcenter.org/publications_recent_publications/media_and_technology/national_minority_broadband_adoption (last visited May 27, 2011).

Hispanic mobile users have adopted smart phones, compared to 27% of White mobile users.¹⁸ These statistics are especially significant given that due to financial and other considerations, minority households are more likely than others to have only a single, wireless on-ramp to the Internet.¹⁹

While wireless is helping minority communities make a significant leap towards closing the digital divide, minorities' reliance on wireless broadband is threatened by the impending spectrum crunch and the potential for capacity constraints to drive up prices for consumers and drive down broadband adoption. Chairman Genachowski recently addressed these very critical issues. He warned that the "explosion in demand for mobile services places unsustainable demands on our invisible infrastructure—spectrum."²⁰ The Chairman explained that "[i]f we do nothing in the face of the looming spectrum crunch, many consumers will face higher prices—as the market is forced to respond to supply and demand—and frustrating service—connections that drop, apps that run unreliably or too slowly. The result will be downward pressure on consumer use of wireless service, and a slowing down of innovation and investment in the space."²¹ All of this, the Chairman emphasized, "would . . . have a disproportionate impact on minority and low-income groups who are more likely than the average American to access the Internet through a mobile device."²² The Chairman's statement should serve as a clarion call to the minority community.

¹⁸ See Don Kellogg, *Among Mobile Phone Users, Hispanics, Asians are Most-Likely Smartphone Owners in the U.S.*, NielsenWire (Feb. 1, 2011), available at <http://blog.nielsen.com/nielsenwire/?p=25901> (last visited May 27, 2011).

¹⁹ See, e.g., National Organizations' Net Neutrality Comments at 11, 18.

²⁰ *CTIA Wireless 2011*, Remarks of FCC Chairman Julius Genachowski at 9 (Mar. 22, 2011) ("Chairman Genachowski CTIA Remarks").

²¹ *Id.*

²² *Id.*

Industry analysts also recognize the potential impact that the spectrum crunch will have on consumers. In the largest U.S. markets, the spectrum crunch is already so serious that, unavoidably, price (through data caps) is being used to bridge the gap between rising demand and limited supply.²³ The prospect that a spectrum crunch may force carriers to use price to suppress demand presents a considerable danger to the minority community because affordability remains a key impediment to minorities' adoption and use of broadband owing to the deep and persistent racial wealth gap and to deep racial disparities in income and unemployment status.²⁴

The National Broadband Plan recognizes that there is a spectrum shortage for wireless services and calls for identifying 500 MHz of additional spectrum for wireless broadband.²⁵ In response, the Commission is seeking Congressional authority to conduct incentive auctions to free up and reallocate broadcast spectrum for wireless broadband applications.²⁶ Under this proposal, which MMTC has enthusiastically endorsed,²⁷ Congress would grant the FCC the

²³ See Craig Moffett, U.S. Wireless: Picking Winners and Losers in the Wake of the Deal," Bernstein Research (April 5, 2011), p. 7 (available from MMTC) ("We are arguably witnessing the leading edge of scarcity pricing").

²⁴ See Seventh Broadband Progress Report at ¶¶65, 70-71 ("identifying] cost as a major obstacle to broadband adoption"); Joint Center Broadband Adoption Study at 29 (identifying affordability as a main barrier to increased broadband adoption among minority groups); see also National Organizations' Net Neutrality Comments at 14; National Broadband Plan at 171-72 (recognizing that affordability is a major barrier to adoption).

²⁵ National Broadband Plan at 10.

²⁶ See, e.g., Statement of Julius P. Knapp, Chief, OET, FCC, Hearing on Using Spectrum to Advance Public Safety, Promote Broadband, Create Jobs, and Reduce the Deficit, Before the Subcommittee on Communications and Technology, Committee on Energy and Commerce, U.S. House of Representatives (April 12, 2011); see also National Broadband Plan at 75 ("Congress should consider expressly expanding the FCC's authority to enable it to conduct incentive auctions").

²⁷ See Comments of the Minority Media and Telecommunications Council, Innovation in Broadcast Television Bands, Allocations, Channel Sharing and Improvements to VHF, ET Docket No. 10-235 (March 18, 2011), available at <http://mmtconline.org/lp->

authority to run two-sided, voluntary spectrum auctions, in which current licensees would voluntarily contribute spectrum and would in return receive a portion of the proceeds of the auction.

Spectrum incentive auctions would solve the spectrum crunch, but they will be a long time in coming. Therefore, wireless providers are looking to private solutions to solve the looming spectrum shortage. This merger is one such initiative and promises to make available additional spectrum in the short term to postpone the severe adverse impact on broadband affordability and adoption that would accompany a spectrum shortage.

The proposed merger will provide a market-based approach to the spectrum crunch that will free up additional spectrum and makes more efficient use of existing spectrum. By easing the spectrum crunch, especially in large majority-minority or nearly majority-minority markets such as New York, Los Angeles, Chicago, and Dallas-Ft. Worth in which AT&T is acquiring T-Mobile spectrum, the merger will avoid triggering the affordability disincentive to minority adoption (which Chairman Genachowski has warned about) and thus avoid a widening of the digital divide. Further, the merger will leverage minorities' adoption of wireless to access the Internet by facilitating AT&T's initiative to deploy LTE to more than 97% of the population,²⁸ a goal closely congruent with the President Obama's broadband deployment objectives.²⁹

[pdf/MMTC%20Spectrum%20Comments%20031811.pdf](#) (last visited May 27, 2011). *See also* [Comments of LPTV Entrepreneurs, Amendment of Parts 73 and 74 of the Commission's Rules et al., MB Docket No. 03-185 \(Dec. 17, 2010\), available at <http://mmtconline.org/lp-pdf/LPTV%20Comments%20121710.pdf>](#) (last visited May 27, 2011).

²⁸ *See Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations, AT&T's Description of Transaction, Public Interest Showing, and Related Demonstrations at 54, 59 (Apr. 21, 2011) ("AT&T Public Interest Showing")* (stating that the merger will allow AT&T to deploy LTE to more than 97% of Americans and thereby help close the digital divide).

²⁹ *See, e.g., President Barack Obama, State of the Union Address (Jan. 25, 2011).*

Although some merger opponents have expressed concern about the impact of the merger on competition and, thus, on wireless prices, such concerns run contrary to the available evidence. The GAO has found that between 1999 and 2009, a period that saw several wireless combinations, wireless prices declined by 50% while network investment increased and consumers' usage of mobile broadband increased dramatically.³⁰ The presence of Sprint and several large regional competitors—MetroPCS, LEAP, U.S. Cellular, and Cellular South—has a strong competitive impact on price. New competitors such as Lightsquared and Clearwire have also come onto the scene, as have prepaid companies like TracFone. Skype (which is being acquired by Microsoft) and Google are similarly providing competition in the voice market. Indeed, the FCC has found that nearly three-quarters of consumers have a choice of five or more wireless providers in the local markets where customers purchase and use wireless services.³¹

The merger will benefit minority broadband consumers in additional ways. Many minorities have hesitated to adopt broadband because they are concerned about the security of their personal information.³² Indeed, owing to racial profiling and the history of poor police-community relations in many minority communities, minorities have every reason to be especially concerned about privacy and security.³³ Notably, AT&T has been an industry leader

³⁰ GAO, *Telecommunications: Enhanced Data Collection Could Help FCC Better Monitor Competition in the Wireless Industry* at 24 (July 2010).

³¹ *Implementation of Section 6002(B) of the Omnibus Budget Reconciliation Act of 1993*, Fourteenth Report, 25 FCC Rcd 11407, 11447-49 (¶¶42-45) (2010).

³² See Seventh Broadband Progress Report at ¶¶65, 75 (stating that “[k]ey barriers include . . . consumers’ lack of trust in broadband and Internet content and services, including concerns about inadequate privacy protections”); Joint Center Broadband Adoption Study at 11; see also The Advanced Communications Law & Policy Institute, New York Law School, *Barriers to Broadband Adoption: A Report to the Federal Communications Commission* (Oct. 2009) (identifying privacy concerns as a barrier to adoption and use).

³³ See, e.g., Barry C. Scheck, *Practicing Law Institute: Section 1983 Civil Rights Symposium: Criminal Prosecution and Section 1983*, 16 *Touro L. Rev.* 895, 896 (Spring 2000).

in network security and in protecting the privacy of consumers' personal information. Last year, AT&T was named one of the Most Trusted Companies in Privacy by the Ponemon Institute, which conducts independent research on privacy, data protection, and information security policy.³⁴ AT&T has also found innovative ways to provide clear, easy-to-read information about its privacy commitments and policy.³⁵

Finally, AT&T has a long track record of advocacy and resource commitment to promote broadband adoption. AT&T has joined forces with the nation's civil rights organizations to urge the Obama Administration to make universal broadband adoption the nation's highest broadband policy priority. AT&T will continue to promote broadband adoption attendant to its rollout of 4G technology,³⁶ and it will offer T-Mobile's low price plans.³⁷ AT&T's plans to promote broadband adoption heighten the important public interest benefits the merger would bring to minority broadband consumers.

II. THE MERGER WILL BENEFIT MINORITY TELECOM WORKERS BY EXTENDING AT&T'S DIVERSITY HIRING PRACTICES AND NEUTRALITY TOWARDS UNIONIZATION.

MMTC also supports the merger because it will benefit thousands of minority telecommunications workers. AT&T has an extraordinary record of minority hiring and promotion, diversity best practices, and neutrality towards unionization. Merging with T-Mobile will allow AT&T to extend these commitments and best practices to even more telecommunications workers.

³⁴ See Ponemon Institute, *Ponemon Survey Names Twenty Most Trusted Companies for Privacy* (2010), available at <http://www.ponemon.org/news-2/26> (last visited May 27, 2011).

³⁵ See AT&T, *AT&T Privacy Policy* (2011), available at <http://www.att.com/gen/privacy-policy?pid=2506> (last visited May 27, 2011).

³⁶ See AT&T Public Interest Showing, pp. 59-61.

AT&T has a strong commitment to diversity and inclusion at all levels of the company, including key leadership roles. The company's workforce is currently 41% female and 39% people of color.³⁸ While the top 50 companies for diversity boast a 13% African American employee base on average, AT&T has a 20% base.³⁹ As the NAACP recently stated, "AT&T has scored among the highest ranked in the telecommunications industry for its commitment to diversity in terms of . . . promotion and hiring."⁴⁰ The NAACP noted that "[o]ther industry authorities such as *Diversity Magazine*, *Black Enterprise*, and *Fortune Magazine* have also given the company impressive marks."⁴¹ Moreover, AT&T has a 12% Hispanic/Latino workforce, which is greater than the 10% average across the top 50 companies for diversity.⁴² AT&T also employs more than 13,000 Asian Americans, representing 5% of the company's workforce.⁴³

DiversityInc, which aggregates data across hundreds of U.S. companies, consistently ranks AT&T at the top of its list for diversity.⁴⁴ DiversityInc ranks AT&T No. 3 in its Top 10 Companies for Recruitment & Retention, No. 1 in its Top 10 Companies for African Americans,

³⁷ See AT&T Public Interest Showing at 9 ("[A]s in AT&T's prior acquisitions, consumers will have the option to keep their current T-Mobile USA pricing plans for existing services.").

³⁸ See AT&T, *Workforce Inclusion* (2011) ("Workforce Inclusion 2011"), available at <http://www.att.com/gen/corporate-citizenship?pid=17725> (last visited May 27, 2011).

³⁹ See DiversityInc, *The DiversityInc Top 50 Companies for Diversity, AT&T* (2011) ("DiversityInc 2011"), available at http://diversityinc.com/cgi-bin/cms/DI_Top50.cgi?mode=view&id=8312/ (last visited May 27, 2011); see also DiversityInc Top 10 Companies for Blacks, available at <http://diversityinc.com/article/8353/The-DiversityInc-Top-10-Companies-for-Blacks/> (last visited May 27, 2011); see also Workforce Inclusion 2011.

⁴⁰ NAACP Apr. 18 Letter at 1.

⁴¹ NAACP Apr. 18 Letter at Attachment.

⁴² See DiversityInc 2011; see also Workforce Inclusion 2011.

⁴³ *Id.*

⁴⁴ See DiversityInc 2011.

and No. 6 in its Top 10 Companies for Latinos.⁴⁵ Other organizations have similarly recognized AT&T's commitment to diversity. The Council of Urban Professionals awarded AT&T its Corporate Diversity & Inclusion Leadership Award, and AT&T was recognized by *Profiles in Diversity Journal* with the Diversity Leader Award.

AT&T also takes deliberate steps to identify and recruit a diverse workgroup. In 2010, for example, AT&T sponsored diversity conferences and recruiting events across the country, including events at the National Society of Black Engineers, National Black MBA, Thurgood Marshall Leadership Institute & Career Fair, National Hispanic Business Association, National Hispanic Professional Association, National Asian MBA Leadership Conference & Expo, Asian Career & Entrepreneur Fair and LEAP Summit, among many others. Recognizing its efforts, DiversityInc has noted that "AT&T University, a remarkable learning center at the company's Dallas headquarters, is used for leadership development and to address vital diversity issues."⁴⁶

Through its work with organizations like the National Urban League, NAACP and the Latino Coalition, and with historically Black colleges and universities, AT&T is one of the telecom industry's leading sponsors of high tech training programs operated by minority institutions. These programs are urgently needed in light of the extremely low and declining level of African American and Hispanic workforce participation in the high tech sector. Indeed, an analysis conducted by the San Jose Mercury News showed that Hispanics comprised only 4.7% of the employees in Silicon Valley's computer-related occupations and African Americans accounted for an even more abysmal percentage—only 1.5%.⁴⁷

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ Mike Swift, *Blacks, Latinos And Women Lose Ground At Silicon Valley Tech Companies*, San Jose Mercury News (May 27, 2010); see also David Honig, *FCC Chief's Proposal Disregards What Congress and America Want*, Roll Call (June 15, 2010) (discussing the

Minority telecom workers will not only benefit from AT&T's diversity best practices as a result of the merger, but from its neutrality on unionization as well. As the Communications Workers of America explained in expressing strong support for the merger, AT&T's acquisition of T-Mobile "presents a real opportunity to . . . expand worker's rights in the wireless industry."⁴⁸ AT&T's ability to bring union wages and benefits to T-Mobile workers is a key reason why the AFL-CIO has also voiced support for the merger. AFL-CIO President Richard Trumka has stated that the merger will "offer[] tens of thousands of T-Mobile USA employees the opportunity to make their jobs good jobs by benefitting from the pro-worker policies of AT&T, one of the only unionized U.S. wireless companies."⁴⁹ The NAACP has similarly emphasized the benefits that the proposed merger will have on telecom workers, expressing "optimi[sm] that AT&T's proven record . . . will truly benefit the acquired company's . . . workers."⁵⁰ Unionization of the T-Mobile workforce, combined with AT&T's unionized workforce, will drive wages up and improve working conditions throughout the industry.⁵¹

problem of minorities and women being shut out of employment opportunities in Silicon-Valley based firms); *see also The Future of Media and Information Needs of Communities in a Digital Age*, GN Docket No. 10-25, Comments of the Minority Media and Telecommunications Council at 4-5 (May 7, 2010) (discussing reports about the unacceptable minority hiring practices of certain Silicon Valley firms).

⁴⁸ See Communications Workers of America, *The AT&T / T-Mobile Merger: Benefits for Consumers and Workers* at 1 (April 2011), available at <https://prodnet.www.neca.org/publicationsdocs/wwwpdf/52011cwa.pdf> (last visited May 27, 2011).

⁴⁹ See AFL-CIO Mar. 21 Statement.

⁵⁰ See NAACP Apr. 18 Letter at 1 and Attachment.

⁵¹ See Oral Testimony of Larry Cohen, President, Communications Workers of America, Before the Senate Committee on the Judiciary, Subcommittee on Antitrust, Competition Policy, and Consumer Rights, p. 11-15 (May 11, 2011) (explaining the opportunities the merger will enable for telecommunications workers as AT&T, the only wireless company that allows unions, extends its reach), available at http://files.cwa-union.org/national/issues/PolicyIssues/Telecom/Larry_Cohen_Senate_Full_Testimony_05_11_11.pdf (last visited May 27, 2011).

These are substantial benefits for minority telecommunications workers, and benefits that MMTC stands firmly behind.

III. BECAUSE AT&T IS AN INDUSTRY LEADER IN PROCUREMENT, THE MERGER WILL BENEFIT MINORITY BROADBAND ENTREPRENEURS.

As the nation transitions from the industrial to the digital age, it is vital that people of color participate in the economy as producers as well as consumers.⁵² Yet the state of minority entrepreneurship in technology is abysmal. Research shows that only 1% of new high tech venture capital is invested with African American entrepreneurs.⁵³

AT&T represents a rare exception to this trend. There is no stronger minority procurement program in the wireless industry than AT&T's. In 2010, AT&T spent \$9.2 billion with minority, women and disabled veterans business enterprises.⁵⁴ Civil rights advocates have applauded AT&T's outstanding record in this regard. For example, the NAACP stated that "AT&T has scored among the highest ranked in the telecommunications industry for its commitment to diversity in terms of procurement."⁵⁵ DiversityInc ranks AT&T No. 2 in its Top 10 Companies for Supplier Diversity.⁵⁶ The Latino Coalition has stated that "AT&T has an outstanding record of teaming with minority-operated businesses and has worked with [the Latino Coalition] in the past years in its B2B Procurement Matchmaking program."⁵⁷ Likewise, the Cuban American National Council stated that "AT&T has long had a reputation of being a

⁵² See State of Social Justice 2010.

⁵³ See CB Insights, *Venture Capital, Human Capital Report: Jan to June 2010*, p. 5-6 (available from MMTC).

⁵⁴ AT&T, *Supplier Diversity* (2011), available at <http://www.att.com/gen/corporate-citizenship?pid=17724> (last visited May 27, 2011).

⁵⁵ NAACP Apr. 18 Letter at 1.

⁵⁶ See DiversityInc 2011.

⁵⁷ Latino Coalition Apr. 27 Letter at Attachment.

committed partner and a responsible corporate citizen to the Latino community. . . . AT&T has proven time and again, that it has a rock-solid commitment to the Latino community.”⁵⁸

Recognizing AT&T’s inclusion of minority enterprises throughout its supply chain, the National Minority Suppliers Development Council named AT&T the 2010 Corporation of the year.

AT&T is also a member of the Billion Dollar Roundtable, a supplier diversity think tank of corporations that spend more than \$1 billion annually with diverse companies. Only a handful of companies qualify for that distinction.

The merger promises to extend AT&T’s outstanding diversity and procurement record to the T-Mobile assets, and it will create extensive new contracting opportunities as AT&T builds out the nationwide LTE network made possible by the merger.⁵⁹ This provides a strong additional basis for concluding that the merger is in the best interest of minority entrepreneurs.

CONCLUSION

By alleviating the spectrum crunch, the merger will help ensure that minorities are not left on the wrong side of the digital divide as the nation completes its transition to the broadband era. The full participation of all Americans in our nation’s most important industries is too critical to democracy to be left to chance. We cannot risk getting this wrong. By easing the spectrum crunch, the merger will give the nation the time it needs to implement a long-term cure for the spectrum crunch through incentive auctions and repurposing of government spectrum.

⁵⁸ See Letter from Guarione M. Diaz, President and CEO, Cuban American National Council, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 11-65 (May 17, 2011).

⁵⁹ AT&T Public Interest Showing, p. 57.

Further, AT&T's leadership in employment and entrepreneurial diversity and its neutrality on unionization add considerable value to the public interest case for approval of the merger. Its acquisition of T-Mobile will allow AT&T to extend these policies and practices to a greater number of minority consumers, telecommunications workers, and entrepreneurs.

As an *amicus curiae*, MMTC respectfully requests the Commission to afford these factors great weight among the public interest priorities it considers in evaluating the merger application.

Respectfully submitted,



David Honig
President and Executive Director
Joycelyn James
Cathy Hughes Fellow
Jacqueline Clary
John W. Jones Fellow
Latoya Livingston
Earle K. Moore Fellow
Minority Media and Telecommunications
Council
3636 16th St. N.W., Suite B-366
Washington, D.C. 20010
(202) 332-7005
dhonig@crosslink.net

May 30, 2011



MISSOURI CHAMBER
OF COMMERCE AND INDUSTRY

May 18, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WT Docket 11-65

Dear Chairman Genachowski:

The Missouri Chamber of Commerce and Industry understands that the quality of life in our state depends on quality jobs for Missourians. To that end, we have one simple mission: to protect and advance Missouri business.

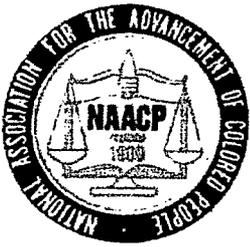
The expansion of mobile broadband throughout Missouri is a welcome sign to all Missourians and to businesses looking to locate or expand in our state. The economic vitality of rural Missouri is particularly impacted by access to the latest technology. That's why the proposed merger of AT&T and T-Mobile USA is so important. Expansion of wireless broadband connectivity is fast becoming a critical component to ensure all Missouri businesses – large and small – are able to compete locally and globally.

I ask that you support this merger and the economic benefits it will bring to Missouri business.

Sincerely,

Daniel P. Mehan
President and CEO

cc:
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



WASHINGTON BUREAU · NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
1156 15TH STREET, NW SUITE 915 · WASHINGTON, DC 20005 · P (202) 463-2940 · F (202) 463-2953
E-MAIL: WASHINGTONBUREAU@NAACPNET.ORG · WEB ADDRESS WWW.NAACP.ORG

April 18, 2011

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

We understand the FCC has opened a docket for public comment on the recently announced acquisition of T-Mobile by AT&T. Enclosed, please find comments from the National Association for the Advancement of Colored People (NAACP) on the announced acquisition.

The NAACP believes that AT&T's acquisition of T-Mobile has the potential to benefit consumers, communities and workers alike. AT&T has scored among the highest ranked in the telecommunications industry for its commitment to diversity in terms of procurement, philanthropy, promotion and hiring, among other criterion at the federal, state and local levels on the NAACP Economic Reciprocity Initiative National Industry Report card.

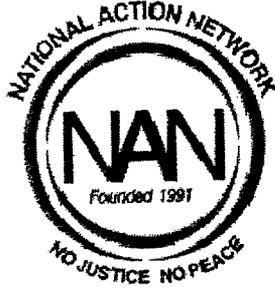
We are hopeful that this acquisition will further advance increased access to affordable and sustainable wireless broadband services and in turn stimulate job creation and civic engagement throughout our country. Wireless broadband is an integral tool in promoting civic engagement and as such is crucial to voter empowerment.

We respectfully ask that you please include our comments in the WT: 11-65 docket.

Sincerely,

Hilary O. Shelton
Director
Washington Bureau and
Senior Vice President for Advocacy and Policy

**CC: Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Rick Kaplan, Chief Counsel and Senior Legal Advisor for Chairman
Genachowski
John Giusti , Chief of Staff and Legal Advisor for Wireless, Public Safety
and International for Commissioner Copps
Angela E. Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless &
International for Commissioner McDowell
Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety
for Commissioner Clyburn
Charles Mathias, Senior Legal Advisor, Wireless, International and
Public Safety Issues for Commissioner Baker**



National Action Network, Inc.

*Reverend Al Sharpton, President & Founder
Reverend Dr. W. Franklyn Richardson, Chairman
Tamika Mallory, Executive Director*

*106 West 145th Street
New York, New York 10039
P.212.690.3070 F.212.690.3081*

ELECTRONICALLY FILED AT [HTTP://WWW.FCC.GOV/ONLINE-FILING](http://www.fcc.gov/online-filing)

May 31, 2011

Hon. Julius Genachowski, Chairman
Hon. Michael Copps, Commissioner
Hon. Robert McDowell, Commissioner
Hon. Meredith Attwell Baker, Commissioner
Hon. Mignon Clyburn, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: AT&T – T-Mobile Merger, WT Docket No. 11-65

Dear Chairman Genachowski and Commissioners:

The National Action Network ("NAN") respectfully submits these Initial Comments in response to the Commission's Public Notice.^[1] Therein the Commission sought assistance in fully evaluating "all substantive issues" regarding the proposed merger.^[2]

NAN's interest in the merger stems from its longstanding role as one of the nation's leading African American civil rights organizations, with chapters throughout the United

^[1] See Public Notice, AT&T Inc. And Deutsche Telekom AG Seek FCC Consent to the Transfer of Control of the Licenses and Authorizations Held By T-Mobile USA, Inc. and Its Subsidiaries to AT&T, Inc., WT Docket No. 11-65 (rel. April 28, 2011), available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0428/DA-11-799A1.pdf (last visited May 24, 2011).

^[2] See id. at 3.

National Action Network, Inc.

States. NAN works within the spirit and tradition of Dr. Martin Luther King, Jr. to promote a modern civil rights agenda that includes the fight for social justice, education, and one standard of justice and decency for all people regardless of race, religion, national origin, and gender.

NAN promotes programs and policies that improve the quality of education, deliver jobs, economic empowerment, and social justice to African Americans nationwide. NAN's local chapters advance these goals: nonviolence, economic empowerment, educational opportunities, civic engagement & voter protection, and the guarantee of civil rights for African Americans.

In today's global technology based societies, to achieve these goals, the nation must close the digital divide and achieve universal broadband access, adoption and informed use. This is the central benchmark against which every major telecom merger should be evaluated.

NAN plans to carefully observe the upcoming regulatory process and looks forward to a transition that is guided by AT&T's commitment to full inclusion, diversity and equal opportunity. We have every reason to be optimistic.

As with any major corporate merger, it is paramount that as strategic decisions are made, workforce and supplier diversity should be critical considerations. On this score, AT&T's Public Interest Showing contains many points that resonate with NAN: AT&T encourages the full participation of all Americans in our digital society through job creation (pp. 56-57); supplier diversity (p. 57), and increased opportunities for broadband adoption in minority communities (pp. 59-60). As NAN has long maintained, these are exactly the key points the Commission should focus upon as the highest priorities in its own public interest analysis.

We understand the Commission's review of the application has just begun. Further we are aware that at this writing, AT&T is formulating the details of the commitments it has made on two subjects of extraordinary interest to NAN and the nation: increased opportunities for minority business enterprises to participate in new merger related transactions, and opportunities for diverse business enterprises to participate in constructing the national 4G wireless network that will be made possible by the merger. These commitments are important elements of the Commission's public interest calculus because they will encourage competition and inclusion among small, diverse digital entrepreneurs in telecommunications.

Based on AT&T's outstanding record with respect to procurement practices, ranked #2 in supplier diversity among all Fortune 500 companies by DiversityInc (2011), we are confident that AT&T's commitments will thoughtfully and comprehensively address these issues. As with any merger, the Commission must prioritize a company's commitment to diversity as a key factor in its public interest analysis. The overlay of AT&T's culture and track record onto the businesses subject to this merger will significantly raise the performance in these critical areas. Whenever AT&T has acquired

National Action Network, Inc.

another company, it has applied its diversity best practices to the acquired assets, and NAN has urged AT&T to do that with the relatively diversity-challenged T-Mobile assets. Efficient use of the entrepreneurial, managerial, innovative and creative talents of African Americans will help make our telecommunications sector internationally competitive.

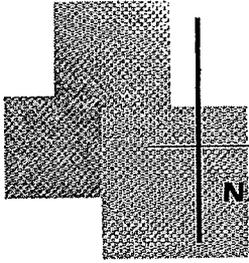
Finally, the Commission should examine this transaction from the perspective of the nation's evolving demographics. By 2042 – a heartbeat in Internet Time – the nation will be majority-minority. And except in the wireless space, the digital divide in adoption and use remains profound – about 20 percentage points still separate African Americans and whites in home broadband adoption, according to NTIA. On the other hand, the Joint Center for Political and Economic Studies has found that 50% of African Americans rely on wireless for Internet access, compared to 30% of whites.

At present, NAN will continue its careful fact finding through discussions with both merger applicant AT&T and other interested parties in pursuit of comprehensive reply comments to be filed with the FCC on or before June 20, 2011. In those reply comments, NAN will not only comment more specifically, but will provide a comprehensive definitive statement for the FCC's consideration as a part of its public interest examination.

Respectfully submitted,



Rev. Al Sharpton
President and Founder



NATIONAL ASSOCIATION OF NEIGHBORHOODS

March 21, 2011

National Association of Neighborhoods (NAN) Statement

For more information contact: Leon Townsend – 202.332.7766 – leon@nanworld.org

AT&T's proposed acquisition of T-Mobile – America's "Can Do" is coming back.

Yesterday's announcement of AT&T's proposed \$39 billion dollar acquisition of T-Mobile from the German telecommunications company Deutsche Telekom is a testament that AT&T, a global American corporation, finds that America is still the best place in the world to invest. Ricardo Byrd, NAN Executive Director, stated in a "Can Do" spirit, "Significant private sector investments in the nation's wireless digital infrastructure mean more jobs and economic growth and innovation opportunities."

NAN strongly supports President Obama's goal to connect "every part of America to the digital age." In the acquisition announcement, "AT&T commits to expand 4G LTE deployment to an additional 46.5 million Americans, including in rural, smaller communities, for a total of 294 million or 95% of the U.S. population." Improving access, service quality and affordable pricing for all of our neighborhoods is critical to closing America's digital divide. AT&T's \$39 billion dollar deal is hopefully a sign that the nation's corporate community can and will accelerate America's transition from an analog age to a new and promising digital age.

1300 Pennsylvania Avenue, Northwest
Suite 700
Washington, DC 20004-3024

Phone: 202.332.7766
Web: www.nanworld.org

A service of:
BlackRadioNetwork.com
MinorityNewsService.net
MinorityNews.net

English

Spanish

JUNE 8 - 12, 2011

Brookings Research Identifies Strategies to Address the Learning Crisis in the Developing World • "Investigation Hour" Returns to Dis
Servidyne Declares Quarterly Dividend • Teen Childbearing Cost Taxpayers \$10.9 Billion in 2008 • Citi Experts to Gather at the Latin A

HOME

UPCOMING EVENTS

SEARCH

SUBSCRIBE

CONTACT

RSS 

ARCHIVE

Like Sign Up to see what your friends like.

 SHARE   

Blacks Support AT&T Acquisition Of T-Mobile

WASHINGTON – The National Black Chamber of Commerce has long recognized that broadband is the great equalizer of the modern era. This is particularly true for small businesses, communities of color, low-income and underserved populations, who realize that the power of broadband is fully experienced via access and use of mobile devices.

It is for this reason that NBCC supports today's announcement of the proposed acquisition of T-Mobile by AT&T. We know and respect the profound power and importance of mobile broadband, and we believe that this arrangement will help provide broadband access to those who have to this point gone without it.

Faster, more robust, efficient and affordable networks are what Americans crave, and that is what this acquisition holds in store for us. The benefits of the deployment of AT&T's 4G LTE networks to 95% of the nation are underscored by the fact that these networks will be supported by the dual infrastructure of AT&T and T-Mobile. Likewise, these networks will allow a more efficient use of spectrum at a time when spectrum scarcity stands as a hindrance to greater adoption and use of mobile broadband networks.

Decidedly, this seems like a step in the right direction. It provides the nation with an opportunity to promote digital equality for all Americans, especially those most in need.

About NBCC

The NBCC reaches 100,000 Black owned businesses. There are 1.9 million Black owned businesses in the United States. Black businesses account for over \$138 billion in annual sales. African Americans have over \$1 trillion in expendable income each year according to the US Bureau of Census. The National Black Chamber of Commerce is dedicated to economically empowering and sustaining African American communities through entrepreneurship and capitalistic activity within the United States and via interaction with the Black Diaspora.

STORY TAGS: AT&T , National Black Chamber of Commerce , NBCC , T-Mobile Acquisition , Black News, African American News, Minority News, Civil Rights News, Discrimination, Racism, Racial Equality, Bias, Equality, Afro American News

[Back to top](#) | [Back to home page](#)

To Reach Us

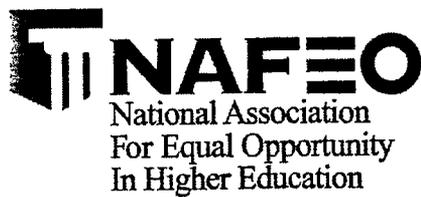
Email:
news@blackradionetwork.com
news@minoritynews.net
news@minoritynewsservice.com

Address:
Black Radio Network
166 Madison Avenue
New York, NY 10016

Phone Numbers:
Ph # (212) 686-6850
Fx # (212) 686-7308

Advertiser Inquiries Welcomed

© 2011 Black Radio Network, Inc. All rights reserved. [About](#) | [Privacy Policy](#) | [Terms of Use](#) | [Archive](#)



If You Can Dream It, You Can Achieve It at an HBCU and PBI!

May 31, 2011

Honorable Julius Genachowski
Chairperson
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Proposed AT & T Merger with T-Mobile USA

Dear Chairman Genachowski:

I am writing as President & CEO of the National Association for Equal Opportunity in Higher Education (NAFEO),¹ to state NAFEO's support for market synergies that will expand consumer access to telecommunication services, especially to families and communities that have traditionally been underserved; and increase the diversity of the telecommunications workforce, contractors, and suppliers. We are especially interested in new market synergies that create greater opportunities for the faculty and alumni of the nation's 105 Historically Black Colleges and Universities (HBCUs) and 50 Predominantly Black Institutions (PBIs) to be part of the governance structures, executive management and other leadership positions in the evolving telecommunications field. HBCUs are sources of enormous innovation and leadership in the sciences, technology, engineering and mathematics (STEM), and can play a unique and important role in providing the research, technology, human capital and outreach needed to ensure the success of the AT & T and T-Mobile merger.

HBCUs are a great national resource in producing graduates in STEM fields. HBCUs produce disproportionate percentages of blacks with undergraduate degrees in science and engineering (S&E): HBCUs constitute 3.3% of US universities yet award 20.5% of all bachelor degrees earned by blacks and 21.8% of all S&E bachelor degrees earned by blacks. <http://www.nsf.gov/statistics/infbrief/nsf08319/>. The top 8, and 20 of the top 50 institutions that

¹ The National Association for Equal Opportunity in Higher Education (NAFEO) is the not-for-profit national membership association of the nation's 105 Historically Black Colleges and Universities (HBCUs) and 50 Predominantly Black Institutions (PBIs), located in 35 states, the District of Columbia, Virgin Islands and Brazil. NAFEO member institutions are located in urban, rural and remote underserved communities.

Founded in 1969, NAFEO is the only membership association of its kind, representing the presidents and chancellors of the diverse black colleges and universities: public, private and land-grant, two-year, four-year, graduate and professional, historically and predominantly black colleges and universities. NAFEO was founded to provide an international voice for the nation's HBCUs; to place and maintain the issue of equal opportunity in higher education on the national agenda; to advocate policies, programs and practices designed to preserve and enhance HBCUs; and to increase the active participation of blacks at every level in the formulation and implementation of policies and programs in American higher education.

granted baccalaureate degrees to black students that went on to earn their doctorates in S & E were HBCUs.

HBCUs are the baccalaureate origins for 33% of African Americans who receive PhDs in STEM. (ref: Role of HBCUs as Baccalaureate-Origin Institutions of Black S&E Doctorate Recipients; NSF 08-319 | August 2008; <http://www.nsf.gov/statistics/infbrief/nsf08319/>). It is estimated that upwards of 40 percent of all African Americans who pursue graduate education in science, technology, engineering and mathematics received their undergraduate degrees from HBCUs.

HBCUs are not only graduating the lion's share of African Americans in STEM, but have excellent business and entrepreneurship programs, communications and marketing programs, finance and other exemplary programs that make them invaluable talent pools for the proposed AT & T and T-Mobile merger.

As I understand it, Mr. Chairman, among the factors being considered by the FCC in assessing and determining whether to advance the proposed corporate merger are considerations of the extent to which the merger will expand telecommunications access, and workforce, contracting, and supplier diversity. I know that access and diversity were critical considerations for AT & T in reaching the decision to advance the merger. NAFEO stands ready to assist you, AT & T and T-Mobile to realize the market share, excellence, access, and diversity goals of the proposed merger.

I thank you for the vigilance with which you are considering the proposed landscape-altering merger, and for affording NAFEO an opportunity to submit these comments.

Sincerely,



Lezli Baskerville
President & CEO



National Black Farmers Association

May 24, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: In the Matter of Applications of AT&T Inc. and Deutsche Telekom AG for Consent to Assign or Transfer Control of Licenses and Authorizations (WT Docket No. 11-65).

Dear Chairman Genachowski and FCC Commissioners:

The National Black Farmers Association (NBFA) is a non-profit, community organization founded in February of 1995, by John Boyd, Jr., of Baskerville, Virginia. The primary mission of NBFA is to help small and disadvantaged farmers gain access to the resources of state and federal programs that support them, and to educate our members and advocate on their behalf on public policy issues that affect them.

NBFA supports AT&T's and T-Mobile's application to merge their wireless assets and licenses. First, AT&T has a strong commitment to the African American community, where one out of every five employees is African American. AT&T has been recognized for years for its commitment to diversity, including its supplier diversity programs designed to promote, increase, and improve the quality of participation of minority, women, and disabled veteran-owned business enterprises in its supply chain. Last year, Black Enterprise named AT&T as one of the 40 Best Companies for Diversity.

Second, NBFA members are disproportionately impacted by this transaction. The PEW Internet and American Life Project determined in a 2010 report that "minority Americans lead the way when it comes to mobile access – especially mobile access using handheld devices. Nearly two-thirds of African-Americans (64%) and Latinos (63%) are wireless internet users, and minority Americans are significantly more likely to own a cell phone than their white counterparts (87% of blacks and Hispanics own a cell phone, compared with 80% of whites). Additionally, black and Latino cell phone owners take advantage of a much wider array of their phones' data functions compared to white cell phone owners."¹

¹ See <http://www.pewinternet.org/Reports/2010/Mobile-Access-2010/Summary-of-Findings.aspx>

AT&T and T-Mobile have made a strong case that they face network spectrum and capacity constraints more severe than those of any other wireless provider, and that this merger provides the fastest and most efficient solution to that problem. The transaction will give the combined company the resources to deploy LTE, the most advanced and fastest wireless network technology, to more than 97% of—covering an additional 1 million square miles across the country than current deployment plans allow—creating new jobs and economic growth in the small towns and rural communities where most NBFA members reside.

There is no dispute that NBFA members have historically faced significant barriers when competing against large corporate farms. Its members cannot afford to be left behind when the fastest and most efficient wireless services and applications cannot be deployed in an efficient and timely manner in small towns and rural communities. NBFA implores the FCC to seriously consider the significant commitments to serve these communities that AT&T and T-Mobile have made as part of its application, and to approve this transaction quickly to minimize any delays in making these commitments a reality.

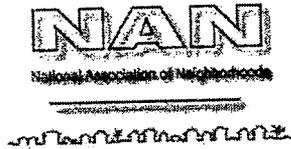
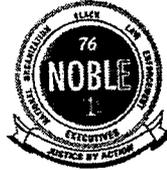
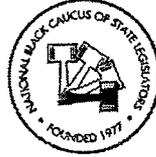
Sincerely,

A handwritten signature in black ink, appearing to read "John W. Boyd Jr.", written over a horizontal line.

John W. Boyd Jr.
President
National Black Farmers Association



100
BLACK MEN
OF AMERICA, INC.



May 31, 2011

Honorable Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT 11-65: Applications of AT&T Inc. and Deutsche Telekom AG for consent to Assign or Transfer Control of Licenses and Authorizations

Dear Chairman Genachowski:

On behalf of our collective membership, representing the 40 million African Americans across the country, we recognize that broadband internet is no longer a luxury, but is essential to the day to day lives of members of our community. With vast numbers of disadvantaged Americans lacking affordable access to broadband, we respectfully submit these comments in support of AT&T's acquisition of T-Mobile USA, Inc.

The current economic climate has been a particularly painful time for the African-American community. We experience extraordinarily high unemployment and enjoy far too few economic opportunities. At last count, more than 16 percent of the nation's black population was without a job, roughly eight percentage points higher, or twice the level of joblessness of the general population.

The merger of AT&T with T-Mobile USA stands to bring some much-needed relief to the African American community by helping to close the digital divide and increasing access to vital services in urban and rural communities. This merger will provide the infrastructure needed to expand access to critical health care services, through expanded availability of new telehealth applications, as well as educational opportunities through advanced wireless technology. A combined AT&T and T-Mobile will bring wireless broadband access to underserved urban and rural communities, create cost-savings for consumers, and increasing jobs across the country.

Across the board, African Americans have proven to be leaders in wireless broadband adoption. Almost 90 percent of African American population owns a cell phone and nearly two-thirds are wireless Internet users. Despite their high wireless adoption rate, African American wireless Internet users frequently contend with substandard and inconsistent access that plagues many urban and rural areas. Large majority-minority markets face a spectrum shortage that can lead to a poor user experience and therefore could discourage African American adoption and use of broadband.

However, if the T-Mobile purchase is approved, AT&T has made commitments to substantially increase broadband access to underserved areas and invest billions in infrastructure upgrades. These investments not only will lead to increased wireless services, they will lead to shovel-ready opportunities that put the unemployed back to work.

AT&T has demonstrated consistently that it is committed to a diverse workforce and supplier base: minority-owned firms make up 20 percent of the company's suppliers and nearly 40 percent of AT&T's employees are people of color.

Economic empowerment and healthcare equity are recognized by many as the final frontiers of the civil rights movement. AT&T's purchase of T-Mobile will lead to wider empowerment of communities of color through more educational opportunities, better access to healthcare services, expanded business development opportunities and more, better paying jobs.

By approving the transaction, the Commission has an opportunity to make a positive economic impact in the lives of the nation's 40 million African Americans and of generations to come as well as help the federal government to meet its goal to deploy the next generation of high-speed wireless coverage to 98% of all Americans. As stated in President Obama's State of the Union Address, "this isn't about faster Internet or fewer dropped calls, it's about connecting every part of America to the digital age."

Respectfully,



Hilary Shelton, Washington Bureau Director and Senior Vice President for Advocacy
National Association for the Advancement of Colored People (NAACP)



Albert E. Dotson, Jr., Esq. Chairman
100 Black Men of America



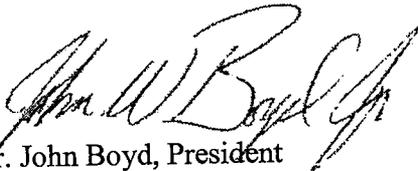
Danny J. Bakewell, Sr., Chairman
National Newspaper Publishers Association



Melanie Campbell, President & CEO
National Coalition on Black Civic Participation (NCBCP)



Dr. Avis Jones-DeWeever, Executive Director
National Council of Negro Women



Dr. John Boyd, President
National Black Farmers Association



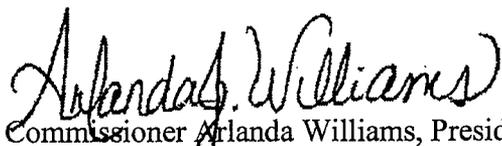
Senator Sharon Weston Broome, President
National Organization of Black Elected Legislative (NOBEL) Women



Representative Barbara Ballard, President
National Black Caucus of State Legislators (NBCSL)



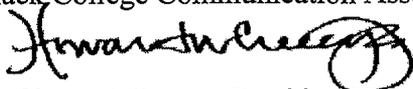
Vanessa Williams, Executive Director
National Conference of Black Mayors (NCBM)



Commissioner Arlanda Williams, President
National Association of Black County Officials (NABCO)



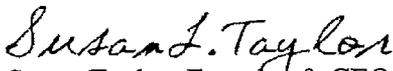
Dr. Valerie White, Chairwoman
Black College Communication Association (BCCA)



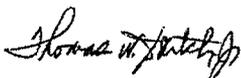
Dr. Howard Creecy, President
Southern Christian Leadership Conference (SCLC)



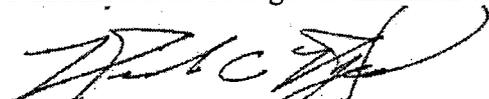
Jesse Lee, Executive Director
National Organization of Black Law Enforcement Executives



Susan Taylor, Founder & CEO
National Cares Mentoring Movement (NCMM)



Tommy Dortch, Chairman
National Black College Alumni Hall of Fame



Ricardo Byrd, President
National Association of Neighborhoods (NAN)



Gary Flowers, CEO
Black Leadership Forum (BLF)

Cc:

Honorable Michael Copps
Honorable Robert McDowell
Honorable Meredith Attwell Baker
Honorable Mignon Clyburn

The National Grange

Of the Order of Patrons of Husbandry

1818 H Street NW, Washington, DC 20008 Phone: (202) 628-3507 Fax: (202) 347-1091



Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

May 27, 2011

RE: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations (WT Docket No. 11-65).

Dear Chairman Genachowski:

The National Grange is the nation's oldest national agricultural organization, with grassroots units established in 2,700 local communities in 40 states. Our 200,000 members provide service to agriculture and rural areas on a wide variety of issues, including economic development, education, family endeavors, and legislative advocacy designed to assure a strong and viable rural America. Formed in the years following the American Civil War, the Grange sought to unite private citizens in improving the economic and social position of the nation's farm population. During the past 143 years, we have extended our mission to include non-farm rural families and communities. As part of the National Grange's mission, we strive to develop the potential of rural families, farms and small businesses in order to build stronger competitive communities and states, as well as a stronger nation.

Expanding telecommunications services in rural areas is a key component of our "Blueprint for Rural America" that we released in 2010. Universal access to affordable, reliable, and competitive telecommunications technologies such as telephone, cellular, wireless, digital broadcast television, radio, Internet, satellite, and competitive video services must be made available to rural communities at affordable costs if these areas are to obtain and remain competitive. As these technologies converge, national, state, and local laws regulating these technologies should be unified in a way that clear the hurdles that have deterred additional investment in rural telecommunications in the past.

AT&T's merger with T-Mobile makes additional investment in wireless broadband for rural areas a *certainty*. AT&T has committed to a more robust national build-out as part of this deal, which is why, on behalf of our members, we support its approval. As we have stated in prior correspondence with the Commission, rural Americans deserve adequate access to modern communications technology.

Federal, state and local governments should not adopt regulations that discourage competition and investment by the private sector. Continued investments within the Internet's infrastructure are imperative to deliver rural Americans a broadband network that rivals those within our

nation's cities and suburbs. Therefore, the National Grange strongly urges the Commission to approve this transaction. Propelling innovation and investment in the wireless broadband industry will further the Commission's ongoing work to enact policies that build a better Internet for rural America.

A stronger, more reliable, and affordable Internet will help rural America to thrive. Rural telecommuters will continue to enjoy rewarding careers and lifestyles, while increasingly conserving energy and reducing traffic congestion. Mobile phones help enable greater levels of personal security in remote areas and offer cost-effective services to low-income individuals. Telemedicine and tele-education both bring vital new services to rural communities. For these reasons and many others we are proud to add our voice to the many encouraging you to approve the proposed merger.

Thank you for your consideration.



Ed Luttrell
President
The National Grange

CC:
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

- [About](#)
- [search](#)
- [skip to content ↓](#)

Android Wires Blog

Latest News and Information on Android Devices



- [Home](#)
- [Android Apps](#)
- [Android News](#)
- [Google Android](#)
- [HTC](#)
- [Mobile Entertainment](#)
- [Motorola](#)
- [Phone Accessories](#)
- [Samsung](#)
- [Tablets](#)
- [Top Links](#)
- [Wireless Connection News](#)

National Newspaper Publishers Association Responds to AT&T and T-Mobile Merger

by [Android Reporter](#) on Mar.22, 2011, under [Mobile Entertainment](#)

Verizon Official Site Verizon.com/SmallBusiness
Business High Speed Internet As Low As
\$24.99/Month & Free Activation!

1 retweet

⌕ This news release has wide tables
⌕ Click to view full screen

WASHINGTON, March 21, 2011 /PRNewswire-USNewswire/ – *Danny Bakewell, Sr., Chairman of the National Newspaper Publishers Association, has released the following statement in response to news that ATT will acquire T-Mobile USA:*

“Yesterday’s announcement of the proposed merger of ATT and T-Mobile takes us a tangible step closer to our goal of cementing broadband as ‘the great equalizer’ it bears the potential to be and increasing jobs and economic opportunities for minority and rural communities.

“In recent years, we have born witness to unprecedented support from government, industry, public citizens and the media to increase broadband access and adoption. That support has been amplified when we talk about the power of mobile broadband to provide access to communities who, whether for geographic, social and economic reasons, have remained disenfranchised from the digital revolution in which America is presently immersed.

“With this new opportunity on the horizon, we can rest assured that those in greatest need of broadband can access it, and that their use will be of the highest quality, most efficient networks possible to facilitate their communications and socio-economic needs.”

National Newspaper Publishers Association (NNPA): *The National Newspaper Publishers Association, also known as the Black Press of America, is a 69-year-old federation of more than 200 Black community newspapers from across the United States.*

SOURCE National Newspaper Publishers Association

[Back to top](#)

Article source: [Read more](#)

[:applications](#), [apps](#), [entertainment](#), [handsets](#), [mobile](#), [phones](#)

Like

0

QShare

Add New Comment

Image

Post as ...

Showing 0 comments

Sort by Popular now [Subscribe by email](#) [Subscribe by RSS](#)

Administrative Office

521 East 63rd Street
Kansas City, Missouri 64110-3329
Telephone: [816] 756.3140
FAX: [816] 756.3144

**Government Affairs Office**

1108 K Street NW, Second Floor
Washington, DC 20005-4094
Telephone: [202] 639.0550
FAX: [202] 639.0559

NATIONAL RURAL HEALTH ASSOCIATION

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 11-65

May 18, 2011

Dear Chairman Genachowski and Commissioners:

The National Rural Health Association (NRHA) applauds the Federal Communication Commission's effort to engage in a dialogue with diverse constituencies before deciding whether to approve the merger between AT&T and T-Mobile. We appreciate the opportunity to comment on this proposed merger.

NRHA is a national nonprofit membership organization with more than 22,000 members. Our mission is to provide leadership on rural health issues. The NRHA membership is made up of a diverse collection of individuals and organizations, all of whom share the common bond of ensuring all rural communities have access to quality, affordable health care.

High-speed wireless access is the most ground-breaking development for rural health in decades. It allows patients and their doctors to connect remotely, exchange vital health information, and conduct real-time video consultations. Telemedicine and eHealth also help to put the patient first through medication adherence technologies, mobile monitoring, and more.

These ground-breaking developments in rural health are due in large part dynamic and competitive wireless industry, with each competitor looking to outperform and out-innovate the others. This leads us back to the AT&T and T-Mobile merger, which has the potential to transform rural health in a dramatic and positive way.

The merger of AT&T and T-Mobile will substantially increase the opportunity for rural Americans to access 4G LTE high speed wireless service. It will bring state of the art technology to rural areas, enabling the use of sophisticated eHealth applications that rely on video conferencing and real time interaction. Rural high speed wireless users will have the same experience as their urban counterparts.

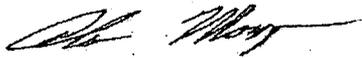
Imagine the improvement in the care and well-being of a patient from a rural community who does not have fast access to a doctor or hospital. With this newly enabled high speed wireless service this patient will be able to transfer critical medical information and speak with their doctor without leaving the comfort of their own home. In addition to gaining access to a state of the art high speed network, rural residents would also be able to use leading edge devices that can run the most sophisticated applications. Telemedicine applications are becoming more capable and powerful by the day. Rural residents deserve the best technology available as well as the best healthcare possible.

However, expanded high speed wireless service is only one piece of the puzzle. AT&T and T-Mobile's networks are technologically compatible; therefore, integration of the two networks will happen faster than might have otherwise been possible. Moreover, the technical compatibility will lead patients to experience faster connection speeds, greater reliability, and increased functionality.

Finally, it must be mentioned that 4G LTE service is the fastest and most reliable high speed wireless service available, so critical health information will receive the proper care and handling that it deserves.

NRHA is hopeful that the AT&T and T-Mobile merger receives a speedy and thoughtful review from the Federal Communications Commission. We trust in your good judgment and thank you for the opportunity to present our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Morgan", with a long horizontal flourish extending to the right.

Alan Morgan
Chief Executive Officer
National Rural Health Association



The National Spinal Cord Injury Association

Leading the way in maximizing
the quality of life and opportunities for people
with spinal cord injuries and diseases
since 1948

June 1, 2011

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

United Spinal Association supports the recently announced acquisition of T-Mobile by AT&T and request that our enclosed comments be included in the FCC's docket for public comment for the 11-65 proceeding pertaining to the announced acquisition.

Access to communications is no longer a luxury, and it is especially critical for millions of Americans with spinal cord injuries or disorders, and their employers, families and friends. Wireless technologies significantly contribute to the daily lives of Americans with disabilities. They increase opportunities for: civic and social participation; connecting with loved ones and support systems; access to current information and other resources; and workforce participation.

AT&T has a long history of working with the disability community and has collaborated with our subsidiary organization, the National Spinal Cord Industry Association. The arrangement between AT&T and T-Mobile has significant potential to enhance opportunities for wireless innovation and mobile broadband deployment, which have demonstrated the capacity to measurably improve the quality of life of Americans with disabilities. We are excited by the potential for such results with the proposed integration of T-Mobile and its resources into the greater commitment of expanding opportunities for Americans with disabilities.

Thank you for this opportunity to comment on this important matter.

Sincerely,

Paul J. Tobin
President & CEO
United Spinal Association

CC: Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn

75-20 Astoria Blvd. Jackson Heights, NY 11370, (800) 962-9629 (V), (866) 387-2196 (F)



NSCIA

The National Spinal Cord Injury Association

Leading the way in maximizing
the quality of life and opportunities for people
with spinal cord injuries and diseases
since 1948

Commissioner Meredith Attwell Baker

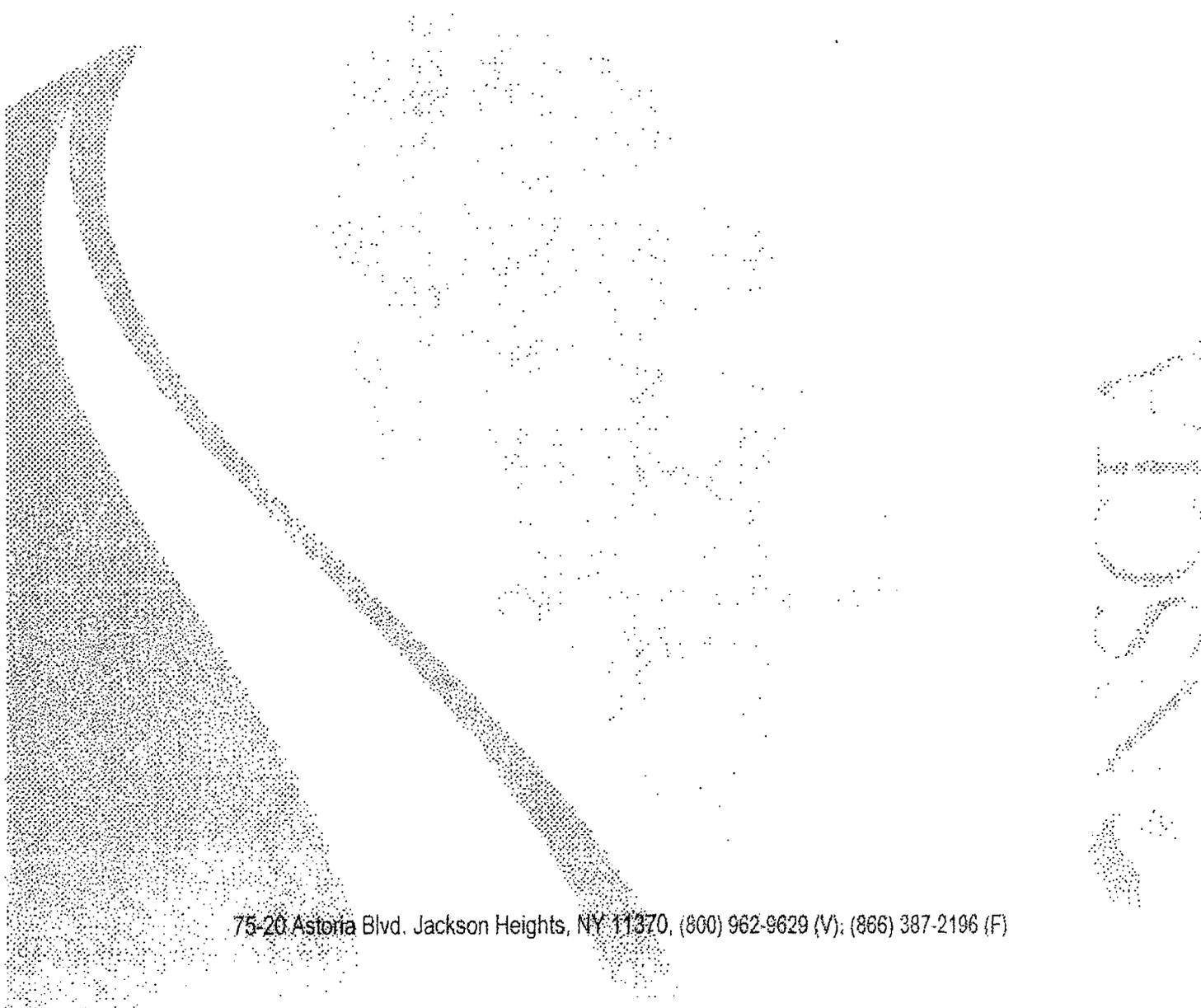
Rick Kaplan, Chief Counsel and Senior Legal Advisor for Chairman Genachowski

John Giusti, Chief of Staff and Legal Advisor for Wireless, Public Safety and International for Commissioner Copps

Angela E. Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless & International for Commissioner McDowell

Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety for Commissioner Clyburn

Charles Mathias, Senior Legal Advisor, Wireless, International and Public Safety Issues for Commissioner Baker



75-20 Astoria Blvd. Jackson Heights, NY 11370, (800) 962-9629 (V); (866) 387-2196 (F)

ADSA



The National Spinal Cord Injury Association

Leading the way in maximizing
the quality of life and opportunities for people
with spinal cord injuries and diseases
since 1948

AT&T Acquisition of T-Mobile USA Holds Tremendous Potential Benefit for People with Disabilities

Comment Submitted by: Paul J. Tobin, President & CEO, United Spinal Association

Access to communications is critical for millions of Americans with spinal cord injuries or disorders, and their employers, families and friends. As FCC Chairman Julius Genachowski said in recent remarks to CTIA (the international association for the wireless telecommunications industry), "broadband is no longer a luxury. It's an essential platform for new products, economic growth and job creation - creating opportunities and opening markets that allow businesses to start, grow, and hire."

Wireless technologies are revolutionizing the daily realities of Americans living with disabilities by increasing opportunities for: civic and social participation; connecting with loved ones and support systems; accessing current information and other needed resources; and workforce participation.

AT&T has a long history of working with the disability community and offering new and innovative applications and devices that help people with disabilities participate competitively in the American workforce. United Spinal Association believes that AT&T demonstrates leadership in communication access through its Universal Design Policy, innovative employment efforts such as Operation Hand Salute and efforts to create ever more innovative and accessible products and services.

Accordingly, this merger could offer enhanced opportunities for wireless innovation and mobile broadband deployment, which have demonstrated the capacity to measurably improve the quality of life of Americans living with disabilities. We look forward to seeing integration of T-Mobile and its resources into the greater commitment of expanding opportunities for Americans living with disabilities.

June 1, 2011



May 25, 2011

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman and Fellow Commissioners,

Over the past few centuries there have been countless famous, unique and quintessentially American things to come out of New Jersey: the light bulb, Campbell's Soup, salt water taffy, M&Ms, world famous tomatoes, Bruce Springsteen, Bon Jovi, Frank Sinatra, Atlantic City and President Grover Cleveland, to name a few. In order to keep up with this impressive pace of production, however, New Jersey needs to remain in a constant state of innovation and growth.

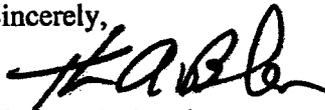
Any advancement or competitive edge that can be unleashed upon the great state of New Jersey will have a strong impact on business production and overall economic innovation. That is why the New Jersey Chamber of Commerce strongly believes that the FCC should approve of the proposed unification of the AT&T and T-Mobile telecommunications companies. This action in itself will have a serious positive impact on businesses in New Jersey and throughout the country.

When Thomas Edison and other business leaders signed our charter one-hundred years ago, there is no way that they could have predicted how drastically the economic landscape would change by 2011. In this day and age, having a reliable and fast broadband connection is essential to operating a successful business. It is important to the New Jersey Chamber of Commerce and thousands of businesses across the state that AT&T's 4G LTE service is upgraded and expanded, as the merger stands to do. Using this new and improved AT&T mobile service, New Jersey businesses will have the world at their fingertips to reach distant communities of untapped markets that are available to produce or consume our goods.

Technological advances can go a long way in the struggle to get ahead. The New Jersey Chamber of Commerce is in a perfect position to take stock of the current needs and challenges of industries and businesses in our state. We need this merger and can only hope that it receives your eventual approval.

In conclusion, I ask that you keep the Garden State in mind when deciding whether or not to approve of this merger. We can only continue producing such quality American goods if this merger is permitted to take place.

Thank you,
Sincerely,



Thomas A. Bracken
President/CEO
New Jersey Chamber of Commerce

CC:

Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



May 26, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia
20554

RE: The 11-65 proceeding on AT&T's application to merge with T-Mobile USA

Dear Chairman Genachowski:

In the 1920s, leaders of North Dakota realized that the state needed more settlers as well as tourists. Out of that need grew the organization now known as the North Dakota Chamber of Commerce. Today, nearly 1,100 businesses are partners with us, sharing a commitment to improving the state's economic and business climate.

As we support pro-business legislation and public policies, we believe that our government should encourage private investment in this country and its infrastructures. Therefore, I am writing you today to urge your support for the merger between AT&T and T-Mobile.

This merger will be beneficial for business because the combining of the two companies' resources and networks will allow them to quickly bring the next generation of wireless service to North Dakota. The company has said that with the merger and \$8 billion in additional investment, it will reach 97 percent or more of Americans with this service within the next few years.

Private investments like this are what the country needs right now to lift us from the economic recession and to create new jobs. Investing in an expansive wireless infrastructure will also help more businesses improve by expanding access and utilization of wireless applications. That is particularly important in less populated states like North Dakota, where we need to reach far and wide in order to build customer bases. Having full Internet availability, including data and video, from virtually anywhere opens new channels.

THE VOICE OF NORTH DAKOTA BUSINESS

PO Box 2659 BISMARCK, ND 58502 Toll-FREE: 800-382-1405 Local: 701-222-0929 Fax: 701-222-1611
WWW.NDCHAMBER.COM NDCHAMBER@NDCHAMBER.COM

The merger between these two companies will be a good thing for the business climate our state and our country. We ask that you please give your support and help businesses survive and grow.

Sincerely,

A handwritten signature in black ink that reads "Andy Peterson". The signature is written in a cursive style with a long horizontal flourish at the end.

Andy Peterson
President & CEO

CC:

Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

Search...

Local Web



Text Size

MERGERS MATTER FOR LGBT WORKERS

The proposed AT&T / T-Mobile merger has significant impact for lesbian, gay, bisexual and transgender workers. AT&T is a union business with a good record on LGBT issues. In contrast, call center workers at T-Mobile have been fighting to form a union, but T-Mobile has been aggressively trying to stop them.

In a majority of states, workers can be legally fired or discriminated against based on their sexual orientation or gender identity or expression. Because of the lack of federal employment protections and the lack of relationship recognition, a union is often the only protection for LGBT workers - and the most powerful way to have a voice on the job.

As the only union cell phone company, AT&T has a policy of neutrality & majority sign-up recognition -- allowing workers to freely make their own decisions about forming a union.



"The fact is that T-Mobile was put up for sale by its German parent company," said Shane Larson, Legislative Director for the Communications Workers of America and Pride at Work National Executive Board member.

"Only two companies were interested in buying T-Mobile: pro-union, pro-equality AT&T, and union-busting, jobs-outsourcing Sprint. For T-Mobile employees, the future is much brighter at a pro-union company like AT&T that enshrines LGBT equality in a legally enforceable union contract," Larson concluded.

For thousand of T-Mobile workers - and the LGBT employees in particular -- this merger will make the difference in whether or not they have the opportunity to negotiate for fair and equal working conditions. It will make the difference in the ability to negotiate for job security, domestic partner benefits, family, medical and bereavement leave and other workplace issues vital to LGBT and all workers.

"GLAAD signed a letter with the National Gay & Lesbian Chamber of Commerce in support of the merger with the understanding that the merger will increase functionality and speed, thus growing engagement and improving the effectiveness of the online advocacy work that is advancing the LGBT movement," said Rich Ferraro, GLAAD's Director of Communications.

"GLAAD also stands behind the AFL-CIO and Pride at Work in believing that this merger will increase access to domestic partner benefits, family/medical/bereavement leave, survivorship benefits, and make life easier for thousands of LGBT employees."

In addition to the T-Mobile workers, this merger matters for the many more LGBT workers who are jobless or underemployed. Supporting efforts that will lead to increased jobs at an LGBT-friendly, worker-friendly company is an urgent priority. For the LGBT community, the labor movement and all progressives, it's vital that we continue fighting for the creation of good jobs that let workers support their families.

To get more involved in the fight for LGBT equality and workers' rights, visit our website <http://www.prideatwork.org/>, become a fan on facebook or follow us on twitter @prideatwork.

Solidarity!

LATEST NEWS

GET HIGHLIGHTS

FIND ISSUES

QUICK LINKS

• Overview: LGBT Labor

• Employment Discrimination

• en Español

- 60 LGBT & Faith Organizations Pledge Solidarity, Action for Workers' Rights
- Request a Training
- Take Action for ENDA
- Learn the Union Difference
- "LGBT Families Count"
- Freedom to Join a Union
- Inclusive Union Contracts
- Immigration
- Same-Sex Marriage
- Transgender Issues
- 2010 Census
- Request Information
- Facebook
- Find a Chapter
- Issues
- Resources
- Take Action
- Twitter

Pride at Work, AFL-CIO, 815 16th Street, NW, Washington, DC 20006.
Phone: 202.637.5014. Fax: 202-639-6264 E-Mail: info@prideatwork.org
Copyright © 2010 by Pride at Work

Based on a template by RocketTheme
Site design by WebTrax Studio

Spanish translation by Frances Sanchez

San Francisco photos credit: Claire Bohman



PROFESSIONAL FIRE FIGHTERS

O F N E W H A M P S H I R E

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

May 26, 2011

WT 11-65: In the matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or transfer control of licenses and authorizations

Dear Chairman Genachowski and Commissioners:

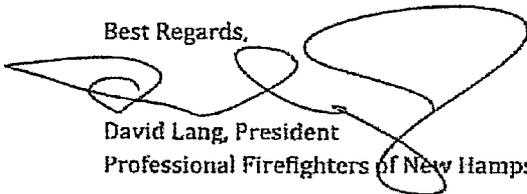
I would like to first thank the Commission for considering the input of individuals and organizations in their review process. I am writing to you as President of the Professional Firefighters of New Hampshire. Our organization represents over 2,000 active and retired firefighters & paramedics from many New Hampshire communities. In regards to the proposed merger between AT&T and T-Mobile, I would like to voice my support for this transaction.

As an organization that represents emergency service personnel, implementing the most effective and most efficient public safety systems is a main concern for us. Fast and reliable communications are extremely important to our industry. For our members, there is no margin for error when it comes to their communications network. Lightning fast communication can often be the difference between life and death. Improved wireless speed and quality will allow communities to build more effective public safety communications system through wireless networks. Parts of New Hampshire are very rural and enhanced wireless communications are very important.

The merger between T-Mobile USA and AT&T promises to bring a high-quality wireless network to nearly all of America. Their 4th Generation LTE network is expected to reach over ninety seven percent of the country within the next several years. The benefits of a state-of-the-art wireless network extend to those people far beyond the industry we represent. People and businesses all over New Hampshire stand to profit off the effects of this deal.

The expansion of service on the part of AT&T and T-Mobile will ultimately mean more jobs are created. Given that AT&T is the only union-neutral wireless provider, the workers will have the option of union representation. Our organization firmly believes that this merger will be good for consumers, workers, and public safety. For this reason, we ask that the FCC permit the transaction to proceed as planned. Thank you once again for your time and consideration.

Best Regards,



David Lang, President
Professional Firefighters of New Hampshire



Project Amiga

*The Family is the Foundation of Our Community
Empowerment through Education & Training*

Board of Directors

Chair

Millie Fleming

Vice Chair

Rafael Garcia
Republic Services Co.

Secretary

Lydia Morales
Housing & Urban Development

Treasurer

Sylvia Sanchez
Sam Mandler Inc.

Board Members

Andrea Burnside
Community Liaison

Felicia Friesema
Foothill Transit

Linda Somilleda
Foothill Transit

Anita Castellanos Esq.
Law Office of Anita Castellanos

Armida Tellez Bolton Esq.
Law Office of Armida Bolton

Vince Sandoval
Wells Fargo Bank

Irene E. Portillo
Executive Director

Tax ID# 95-4410599

South El Monte Site

- 2001 Tyler Ave. Suite #203
South El Monte, CA 91733
(626) 401-1395 Phone
(626) 401-3707 Fax
Email: project_amiga@yahoo.com
Website: www.projectamiga.com

- East Los Angeles Site**
El Pueblo del Sol Center
(Formerly Aliso Village)
1300 Plaza del Sol
Los Angeles, CA 90033

May 25, 2011

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

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations

Dear Chairman Genachowski and Commissioners:

At Project Amiga we are dedicated to reaching out to the residents of Los Angeles County to address the high unemployment and school dropout rate among Latinos. This is not an easy task given today's economy and the challenging living conditions in our area. I see the merger between AT&T and T-Mobile USA as an opportunity for technological advancement and job creation.

Many Latinos face barriers in today's job market. A lack of access and knowledge about network devices does not have to be one of them. Vocational computer training is a big part of what we do at Project Amiga. We try to stress the importance of today's communications industry and how it is an essential part of the business world. If this merger happens, there will be a dramatic increase in coverage in California and nationwide—about 55 million more people will have reliable mobile broadband coverage.

I ask that you consider the Latino population of Los Angeles County. We have a lot to gain from increased wireless access. There is no time to waste when it comes to the technological advancements in our community.

Sincerely,

Irene Esparza Portillo
Project Amiga



Project Amiga

*The Family is the Foundation of Our Community
Empowerment through Education & Training*

Board of Directors

Chair
Millie Fleming

Vice Chair
Rafael Garcia
Republic Services Co.

Secretary
Lydia Morales
Housing & Urban Development

Treasurer
Sylvia Sanchez
Sam Mandler Inc.

Board Members

Andrea Burnside
Community Liaison

Felicia Friesema
Foothill Transit

Linda Somilleda
Foothill Transit

Anita Castellanos Esq.
Law Office of Anita Castellanos

Armida Tellez Bolton Esq.
Law Office of Armida Bolton

Vince Sandoval
Wells Fargo Bank

Irene E. Portillo
Executive Director

CC:

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell

Tax ID# 95-4410599

South El Monte Site

- 2001 Tyler Ave. Suite #203
South El Monte, CA 91733
(626) 401-1395 Phone
(626) 401-3707 Fax
Email: project_amiga@yahoo.com
Website: www.projectamiga.com

East Los Angeles Site

El Pueblo del Sol Center
(Formerly Aliso Village)
1300 Plaza del Sol
Los Angeles, CA 90033



SACRAMENTO FIRE DEPARTMENT

RAY S. JONES
FIRE CHIEF

CITY OF SACRAMENTO
CALIFORNIA

5770 FREEPORT BLVD
SUITE 200
SACRAMENTO, CA
95822

PH 916-808-1300
FAX 916-808-1629

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C.
20554

Re: WT Docket 11-65

Dear Chairman Genachowski,

The safety of our nation's citizens is always my greatest concern. As a Deputy Chief in the Sacramento Fire Department in California, I am keenly aware that public safety requires reliable wireless technology. With so many Americans cutting the cord on home phones, wireless has become their only means of contacting first responders in an emergency. These citizens require wireless services that have the capacity to meet their needs.

When wildfires and flooding ravage California, communication networks can become damaged and unusable. However, many commercial networks have the durability and capability essential for emergency responders. The AT&T/T-Mobile merged company plans to expand LTE coverage to over 97 percent of the population, covering more towns and small cities than ever before.

A wider coverage map with greater network capacity will help save the lives of more people by helping to connect them with first responders.

Sincerely,

D/C Troy Malaspino
Sacramento Fire Department



SAN FRANCISCO
CHAMBER OF COMMERCE *Where smart business starts.*

Steven B. Falk
President & CEO

May 23, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: The 11-65 proceeding, AT&T's application to merge with T-Mobile USA

Dear Chairman Genachowski:

The San Francisco Chamber of Commerce represents over 1,500 member businesses that employ over 250,000 Bay Area residents. They vary in size and industry and come from every neighborhood in the city. One thing they all have in common is their need for superior wireless communications technology to keep their businesses running smoothly. With the emergence of smartphones and tablets, many small business owners are able to remain connected to company operations and employees while still being able to operate outside the office. This increases productivity and efficiency, helping grow their business and our nation's economy.

Many people in San Francisco rely heavily on their cell phones and the demand for faster and more reliable connections is rapidly increasing. As carriers look for ways to meet these demands, AT&T will be able to expand their network capacity and provide the superior service we've all come to expect through their proposed merger with T-Mobile. Furthermore, if the merger is approved, AT&T will now be able to bring 4G LTE service to over 97 percent of the population, which will make staying connected, everywhere, easier than ever.

The economic vitality of our nation is directly connected to the growth of our businesses and their investment in our communities. By continuing their significant investment in our wireless services, AT&T will give a boost to the U.S. economy, creating jobs and improving business performance. In so many ways the merger will help our economy, and we hope you will not hinder the approval of this transaction, as it is vital to our nation's continued success.

Sincerely,

Steve Falk
President & CEO
San Francisco Chamber of Commerce

CC:
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

SEQUOIA CAPITAL
THE ENTREPRENEURS BEHIND THE ENTREPRENEURS

U.S. CHINA INDIA ISRAEL

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

May 24, 2011

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations

Dear Chairman Genachowski:

We enthusiastically support your policies that aim to free-up the spectrum necessary so all network providers can construct next-generation broadband networks. We believe that the combined spectrum positions and physical infrastructure of AT&T and T-Mobile will deploy a 4G LTE broadband service, that reaches 97% of the United States, in a far faster timeframe than either firm could achieve on its own.

In our estimation, one of the greatest opportunities for future economic growth involves wireless broadband and mobile devices. The rise of smartphones like the iPhone and Android devices has created a powerful new computing platform on which many start-ups are being built. However, this growth opportunity faces a challenge with the looming prospect of "spectrum exhaust". If overcrowded networks are unable to provide the bandwidth required, then millions-upon-millions of Americans will not enjoy the benefits of the exciting new ideas, devices and applications that are being developed by today's start-ups and will be pursued by tomorrow's innovators.

We hope that you receive our collective voice on this important matter in proportion to the audience we represent. We're in the business of financing and helping technology start-ups create new jobs, revive struggling communities and generate a substantial tax base. According to the National Venture Capital Association, each year, the small community of venture capital firms enable the start-ups they back to generate roughly \$3 trillion in revenue, put more than 12 million people to work, and account for more than one-fifth of the total economy. From the microchip to the mainframe to the PC to the Internet to mobile computing, venture capital have been an integral part of an economic model that has stimulated growth time-and-time again.

The technology start-ups we work with will be a key beneficiary of this more efficient and robust national wireless network. We are in favor of the Commission approving this transaction.

Thank you for your consideration.



Jim Goetz

General Partner on behalf of Sequoia Capital

CC:

Commissioner Meredith Attwell Baker

Commissioner Mignon Clyburn

Commissioner Michael Copps

Commissioner Robert McDowell

FOR IMMEDIATE RELEASE: May 5, 2011
CONTACT: Christopher Nulty, 202.538.1059

SEIU'S Henry: Acquisition of T-Mobile USA by AT&T is Good News for Consumers, Workers and U.S. Economy

Following the announcement that AT&T will acquire T-Mobile USA, Mary Kay Henry, the International President of the Service Employees International Union, issued the following statement:

"This merger is a win-win for American families. Now, thousands of workers in the telecommunications industry will have the opportunity to collectively bargain and insist that good, quality jobs stay in our communities. And with a stronger voice on the job, workers can ensure that they deliver the best service to consumers.

"As America's working families continue to struggle, we must meet this moment with innovative solutions to expand opportunity and rebuild America. Access to high-speed internet access continues to define access to educational opportunities, economic development, job training, healthcare and government services, making the telecom industry a critical part of this effort. AT&T's commitment to expanding high-speed broadband access to 95% of Americans is the sort innovative solutions our economy demands."

Background on Benefits of Merger:

- First, the merger will expand access to high-speed wireless Internet to 95% of the population. T-Mobile had no plans to bring 4G LTE wireless to its 34 million customers. AT&T has made a commitment to expand 4G LTE service to an additional 46.5 million and reach 95% of the U.S. population.
- Second, the merger could have a positive impact on prices. Wireless prices declined 33% from 1999-2011 despite significant mergers. Even after this merger there will still be many competitors in individual markets. Furthermore, the Federal Communications Commission and the Department of Justice will likely require AT&T to sell all or part of its assets in specific markets where it is determined to have too much market power.
- Third, the merger will improve conditions on the job for thousands of T-Mobile workers, thereby improving service quality for consumers. In general, better workplace relations positively impact product quality. This merger will improve workplace relations for employees of T-Mobile by giving their 20,000+ non-management workers a voice in the workplace. AT&T—the only union wireless company—stays neutral and allows workers to make their own decisions about whether or not to join a union. T-Mobile actively intervenes in this process through such practices as requiring workers to attend anti-union meetings, pressuring workers to report on any union contacts, and taking photos of workers accepting union literature. After the merger, T-Mobile's workers will be able to make their own decision without fear or management interference.

###

With 2.2 million members in Canada, the United States and Puerto Rico, SEIU is the fastest-growing union in the Americas. Focused on uniting workers in healthcare, public services and property services, SEIU members are winning better wages, healthcare and more secure jobs for our communities, while uniting their strength with their counterparts around the world to help ensure that workers—not just corporations and CEOs—benefit from today's global economy.



May 25, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Genachowski,

On behalf of the Sierra Club's more than 1.3 million members and supporters, we add our voice to that of our brothers and sisters in the labor movement to express optimism about the potential expansion of broadband that the proposed merger of AT&T and T-Mobile provides.

As part of the acquisition, AT&T has committed to expanding its 4G LTE to 95 percent of the American population – 294 million people. This is an important step toward expanding broadband to rural areas and building sustainable communities. Expansion of broadband technologies to rural America brings a vital 21st century infrastructure to all our communities and will conserve energy by eliminating carbon emission related to travel and promote other efficiencies through smart grids and smart meters accessed through broadband.

As regulators examine this transaction, they should consider these values in their deliberations. It is important that the Department of Justice, the Federal Communications Commission, and the United States Congress thoroughly examines this proposal to ensure that it complies with our laws and creates the best conditions for the American people. Strengthening the nation's mobile broadband infrastructure can help foster the next wave of growth and innovation.

Sincerely,

Michael Brune
Executive Director

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker



224 Airport Parkway, Suite 620
 San Jose, California 95110
 (408)501-7864 Fax (408)501-7861
 www.svlg.net

May 27, 2011

CARL GUARDINO
 President & CEO

TO: Members of the Federal Communications Commission

Board Officers:
 AART DE GEUS
 Chair

FROM: Carl Guardino, President & CEO
 The Silicon Valley Leadership Group

Synopsys
 TOM WERNER
 Vice Chair

SunPower
 MICHAEL SPLINTER
 Immediate Past Chair

Applied Materials, Inc.
 WILLIAM T. COLEMAN III
 Past Chair

Cassatt Corporation
 ROBERT SHOFFNER
 Secretary/Treasurer

Citibank

Founded in 1978 by David Packard of Hewlett-Packard, the **Silicon Valley Leadership Group** represents more than 340 of Silicon Valley's most respected employers on issues that affect the economic health and quality of life in Silicon Valley. **Our members collectively provide nearly one of every three private sector jobs in Silicon Valley.**

On behalf of the Leadership Group, it is my pleasure to submit the following observations regarding the proposed AT&T-T-Mobile merger:

Board Members:
 JOHN ADAMS
 Wells Fargo Bank

SHELLYE ARCHAMBEAU
 MetricStream, Inc.

RICHARD BAIRD
 IBM Corporation

MARY ANN BARNES
 Kaiser Permanente

NED BARNHOLT
 KLA-Tencor

GEORGE BLUMENTHAL
 University of California, Santa Cruz

TOM BOTTORFF
 Pacific Gas & Electric

DAVID DEWALT
 McAfee, Inc.

RAQUEL GONZALEZ
 Bank of America

JON HOAK
 Hewlett-Packard Company

RICHARD LEVY
 Varian Medical Systems

PAUL LOCATELLI, S.J.
 Santa Clara University

DOUG MERRITT
 SAP Labs

LEN PERHAM
 Monolithic Systems

KIM POLESE
 SpikeSource, Inc.

WILLIAM E. RHODES III
 BD Biosciences

ABHI TALWALKAR
 LSI Logic

DAN WARMENHOVEN
 Network Appliance

KENNETH WILCOX
 SVB Financial Group

1. This merger is a logical, viable solution to the looming spectrum shortages our economy faces.

2. Equally important, the merger will accelerate the deployment of the fastest mobile technology available today to over 300 million Americans.

For reasons we describe below, these two issues are crucial to maintain the nation's leading position in many emerging industries vital to the Valley.

I. Wireless & Telehealth

To begin, federal officials must recognize that many promising Silicon Valley ventures require public access to high-speed Internet service; wireless access is an important part of this. The Leadership Group is a longtime supporter of wireless broadband deployment through continued investment in such programs as the California Advanced Services Fund and California Telehealth Network. The Commission should know that California is a leader in promoting telehealth options that offer the potential for:

- o Fast, real-time diagnoses,
- o Fewer visits to the doctor's office,
- o Greater ability to live independently, and
- o The potential for significant savings on healthcare costs.

In the San Joaquin Valley, where access to affordable healthcare is a major issue, these benefits are already improving lives through the Valley Telehealth Partnership. This program offers real-time video access to specialists, as well as remote consultations on dermatology, endocrinology, gastroenterology, and infectious diseases.

Working Council Chair
 VICTOR ARRAÑAGA, JR.
 Applied Materials

This is just the kind of efficient, cutting-edge healthcare effort America needs to improve access at a competitive price. Advanced broadband is crucial for the success of telehealth and in heavily rural areas, where broadband deployment costs can be

Established in 1978 by
 DAVID PACKARD

considerable, improved wireless access is the best and most cost-effective option to make this a reality.

II. Wireless & Clean Tech

Silicon Valley has a proud legacy of being the birthplace of many businesses and ideas that have changed the world. Many of our members are strongly committed to ensuring that the next wave of innovation transforms the Valley into an incubator for "Clean Tech," especially the clean energy aspect of clean tech.

Wireless technologies have been shown to offer cost-effective ways to control energy costs. One example of an innovative approach involves the growth of wireless gauge readers, which Silicon Valley companies are trying to perfect. These devices either replace or attach to existing old-style needle dial gauges. They record usage information and wirelessly communicate it to a central terminal.

This eliminates the need for technicians to collect the data manually. It also allows for inexpensive and remote monitoring of electrical usage, including thermostat settings, in ways that allow consumers to save energy and reduce costs. Our companies are also involved in developing web-based software applications for buildings that allow managers to control and manage the building's air temperature wirelessly by zones and occupancy. For example, a new thermostat recently developed by Silicon Valley company Cypress Envirosystems is equipped with wireless technology that offers the potential for a 10-15 percent reduction in yearly energy usage, with a very low switching cost. Additionally, these devices help reduce maintenance costs by allowing technicians to identify and pinpoint blockages, leaks and other problems.

Programs such as these are sustaining jobs and economic growth in California. Their continued growth depends on the accelerated deployment of high-speed, high-capacity wireless systems. This is the context through which we view the T-Mobile merger with AT&T. By expediting the roll-out of 4G-LTE wireless networks to 55 million additional Americans nationwide, the combined company offers tremendous growth potential for the Silicon Valley companies that are producing these cutting-edge technologies.

The Silicon Valley Leadership Group is dedicated to leading the country out of economic recession and building the industries of the future. We believe that federal policies can help create the environment that enables American businesses to flourish. Foremost among these involves spurring private companies to invest in the most advanced communications systems available, including 4G-LTE wireless networks. The merger of AT&T and T-Mobile offers the best option to expand these advanced networks nationwide.

Sincerely,



Carl Guardino
President & CEO
Silicon Valley Leadership Group

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Applications of AT&T Inc.)	
and Deutsche Telekom AG)	
for Consent to the Transfer)	
Of Control of Licenses and Authorizations)	WT Docket No. 11-65
Held By T-Mobile USA, Inc. and Its)	
Subsidiaries to AT&T, Inc.)	
)	
For Consent To Assign or Transfer)	
Control of Licenses and Authorizations)	

**COMMENTS OF
THE TECHNOLOGY NETWORK (“TECHNET”)**

Rey Ramsey
President and Chief Executive Officer
TechNet
805 15th St NW, Ste 708
Washington, D.C. 20005
(202) 650-5100

Dated: June 8, 2011

The Technology Network (“TechNet”), which represents the nation’s leading technology companies in support of policies to strengthen the nation’s innovation-driven global competitiveness, submits these comments to express our views on the proposed merger between AT&T and T-Mobile (WT Docket No 11-65). TechNet is the bipartisan policy and political network of CEOs that promotes the growth of the innovation economy. TechNet sees opportunities for job-creating investments in the combined AT&T-T-Mobile network, as well as easing constraints on the utilization of increasingly scarce spectrum. Expanding the capability and capacity of broadband spectrum is of critical importance to TechNet’s member companies. Such increased broadband spectrum will allow our members to grow their business in the technologies, services, software and equipment that make apps, social networking, mobile banking and payments, long-distance learning, mobile commerce, energy management and countless other activities possible. TechNet urges policymakers to keep these potential upsides in mind when considering this merger. Specifically, TechNet sees three opportunities associated with this proposed merger.

First, a combined AT&T and T-Mobile could help alleviate an impending shortage of spectrum while also accelerating the deployment of wireless broadband nationwide. The two companies have complementary spectrum assets that, when combined, promise efficiencies in the use of spectrum that effectively increase overall spectrum supply. Among the possible consequences of combining the two companies’ spectrum assets is a more rapid rollout of a national 4G Long Term Evolution (LTE) network. An AT&T-T-Mobile merger could mean that a fourth generation wireless broadband network would get to more Americans faster.

Second, the proposed merger is consistent with goals laid out in the National Broadband Plan (NBP) to increase the availability of spectrum. The NBP points out the growing demand for

spectrum in America and spectrum's role as the "great enabler" for social and economic advancement.¹ Although a range of policy initiatives are necessary to better allocate and utilize spectrum, the combined spectrum assets of AT&T and T-Mobile can be an ingredient in making wireless broadband more quickly and widely available throughout America.

Third, a combined AT&T and T-Mobile could also foster job creation. To meet AT&T's commitment to cover 97% of the U.S. population with an LTE network, the combined companies would make sizable additional investments in the network build-out to accomplish this goal. This means jobs for workers in the industries that build wireless broadband networks.

TechNet is not now taking a position on any conditions that may be placed on this proposal by any government agency. We appreciate you taking our perspectives under consideration.

Dated: June 8, 2011

Respectfully Submitted,

The Technology Network ("TechNet")

By _____ /s/

Rey Ramsey
President and Chief Executive Officer
TechNet
805 15th St NW, Ste 708
Washington, D.C. 20005
(202) 650-5100

¹ Chapter 5 of the National Broadband Plan discusses the growing need for spectrum and the need to accelerate the pace at which new spectrum is made available in the marketplace. See "Connecting America: The National Broadband Plan." Available online at: <http://www.broadband.gov/plan/5-spectrum/>

This was printed from Atlanta Business Chronicle

AT&T to buy T-Mobile for \$39B

Atlanta Business Chronicle

Date: Sunday, March 20, 2011, 3:01pm EDT - Last Modified: Monday, March 21, 2011, 10:59am EDT

Related:

Technology

AT&T Inc., whose wireless unit is based in Atlanta, will buy wireless provider T-Mobile USA from Deutsche Telekom in a \$39 billion cash-and-stock deal.

The companies reported jointly Sunday afternoon an agreement approved by the boards of directors of both companies. The \$39 billion purchase price includes a cash payment of \$25 billion with the balance to be paid using AT&T common stock, subject to adjustment. AT&T assumes no debt from T-Mobile USA or Deutsche Telekom.

"AT&T's acquisition of T-Mobile USA provides an optimal combination of network assets to add capacity sooner than any alternative, and it provides an opportunity to improve network quality in the near term for both companies' customers," AT&T said in a press release. "In addition, it provides a fast, efficient and certain solution to the impending exhaustion of wireless spectrum in some markets, which limits both companies' ability to meet the ongoing explosive demand for mobile broadband."

After the deal is complete in about a year, AT&T will expand 4G LTE (Long Term Evolution) deployment to 95 percent of the U.S. population to reach an additional 46.5 million Americans beyond current plans – including rural communities and small towns.

Deutsche Telekom will get an 8 percent equity stake in AT&T (NYSE: T) and a Deutsche Telekom representative will join the AT&T board of directors.

Forbes.com blogger **Elizabeth Woyke** on Sunday quoted AT&T Inc., whose wireless unit is based in Atlanta, will buy wireless provider T-Mobile USA from Deutsche Telekom in a \$39 billion cash-and-stock deal.

The companies reported jointly Sunday afternoon an agreement approved by the boards of directors of both companies. The \$39 billion purchase price includes a cash payment of \$25 billion with the balance to be paid using

AT&T common stock, subject to adjustment. AT&T assumes no debt from T-Mobile USA or Deutsche Telekom.

"AT&T's acquisition of T-Mobile USA provides an optimal combination of network assets to add capacity sooner than any alternative, and it provides an opportunity to improve network quality in the near term for both companies' customers," AT&T said in a press release. "In addition, it provides a fast, efficient and certain solution to the impending exhaustion of wireless spectrum in some markets, which limits both companies' ability to meet the ongoing explosive demand for mobile broadband."

After the deal is complete in about a year, AT&T will expand 4G LTE (Long Term Evolution) deployment to 95 percent of the U.S. population to reach an additional 46.5 million Americans beyond current plans – including rural communities and small towns.

Deutsche Telekom will get an 8 percent equity stake in AT&T (NYSE: T) and a Deutsche Telekom representative will join the AT&T board of directors.

Forbes.com blogger **Elizabeth Woyke** on Sunday quoted Credit Suisse analyst **Jonathan Chaplin**, who called the deal "phenomenal...if it happens."

According to Woyke, Chaplin wrote in a research note that he had "never seen a deal with more regulatory risk be attempted in the U.S."

"AT&T's acquisition of T-Mobile will fortify Georgia's position as a leading IT communication's cluster," said Technology Association of Georgia President **Tino J. Mantella**. "Ultimately, this means more and better paying jobs for our state. Expanded and faster coverage will enable more rural communities to better support their established businesses while competing to recruit new ones there."

	<p>Refinance Rates from 2.87% Get a 200K Mortgage for \$842/mo. Compare Lenders and Save. Free & ... mortgage.hsh.com</p>		<p>BI Doesn't Have To Be Difficult. The Best Business Decisions From A Panoramic View Of Your Business... www.foresightintelligence.com</p>
<p>Ads By Marchex</p>			

FOR IMMEDIATE RELEASE

April 28, 2011

CONTACT:

press@ufcw.org

**STATEMENT BY UNITED FOOD AND COMMERCIAL WORKERS INTERNATIONAL
UNION PRESIDENT JOE HANSEN ON THE AT&T AND T-MOBILE MERGER**

Washington, D.C. – The acquisition of T-Mobile USA by AT&T is good news for workers, consumers and the U.S. economy. This merger represents an opportunity for the U.S. to expand high speed broadband and buildout, narrow the digital divide and improve the quality of service for consumers. This merger also gives T-Mobile workers the same protections and bargaining power as the 42,000 unionized workers at AT&T, the only wireless provider that has a unionized workforce.

A strong partnership already exists between the Communications Workers of America (CWA) and the German trade union, ver.di, and the two unions formed a joint organization called TU that represents T-Mobile workers on both sides of the Atlantic. In Germany, Deutsche Telekom, which owns T-Mobile, fully recognizes workers' bargaining rights, and ver.di is a full and positive partner. That has not been the case in the U.S., where T-Mobile workers have been discouraged from forming a union.

Amid the anti-union legislation sweeping through the country, this merger is a positive step in the right direction for workers who want to make their own choice about having a bargaining voice. The UFCW has no doubt that T-Mobile's workers will benefit from their association with the CWA and the union's president, Larry Cohen, and finally have a voice in their workplace.

###

The United Food and Commercial Workers International Union (UFCW) represents more than 1.3 million workers, primarily in the retail and meatpacking, food processing and poultry industries. The UFCW protects the rights of workers and strengthens America's middle class by fighting for health care reform, immigration reform, living wages, retirement security, safe working conditions and the right to unionize so that working men and women and their families can realize the American Dream. For more information about the UFCW's effort to protect workers' rights and strengthen America's middle class, visit www.ufcw.org.



May 27, 2011

Chairman Julius Genachowski
Federal Communications Commission

445 12th Street, SW
Washington, D.C. 20554

Dear Mr. Chairman:

I am writing you in reference to the AT&T proposal to merge with T-Mobile USA (under review in the Commission's 11-65 docket). Thank you for allowing me to comment as to how this merger will positively impact labor unions in Oregon. I serve as Secretary-Treasurer for the United Food and Commercial Workers, Local 555 and our organization officially supports the merger because it will protect current workers and provide opportunities for additional union workers.

As a combined entity, the new AT&T will make massive investments in infrastructure which will necessitate the adding of vital jobs. Already, AT&T has the largest full-time unionized workforce in the wireless industry. We believe that future investment will not only add to that but will also enable additional hiring which will in turn strengthen the economy.

Allowing AT&T to merge with T-Mobile will also bring about investment in the wireless industry. The industry is growing by leaps and bounds, making America the leading nation for wireless technology. The advantages of this growth are apparent in the new devices we are all using, the networks which enable greater connectivity and the jobs that are being created. We look forward to greater job growth and union participation as a result of this merger.

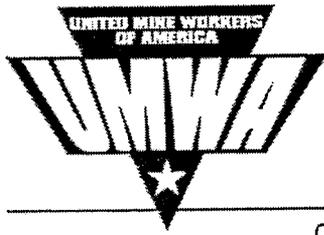
Sincerely,

Jeff Anderson

Please CC to:
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker

Dan Clay, President
Jeff Anderson, Secretary-Treasurer

United Food and Commercial Workers Union, Local 555
7095 SW Sandburg Street • PO Box 23555 • Tigard, Oregon 97281-3555
Office (503) 684-2822 • Fax (503) 620-3816 • (800) 452-UFCW • www.ufcw555.com



News from the United Mine Workers of America, AFL-CIO, CLC

UMWA

18354 Quantico Gateway Drive

Suite 200

Triangle, VA 22172-1179

Cecil E. Roberts, President

Daniel J. Kane, Secretary-Treasurer

Communications Department • 703-291-2405 • FAX 703-291-2447

FOR IMMEDIATE RELEASE

MAY 23, 2011

CONTACT: Phil Smith
703-291-2430

UMWA supports AT&T, T-Mobile merger

[TRIANGLE, VA] United Mine Workers of America International President Cecil E. Roberts issued the following statement today:

“The merger of AT&T and T-Mobile will bring benefits to the American consumer for years to come. That will be especially true in the rural areas of our nation where so many UMWA members live and work.

“The merger will mean the expansion of next-generation wireless service to more than 97 percent of Americans, meaning that 55 million more people will have service than currently do. This will mean the end of the ‘digital divide’ for many underserved people who have not had access to necessary and secure wireless services.

“I especially want to point out that expanding and upgrading service into rural America will be of great benefit to many of our members and the communities where they live. It will also mean many needed, good-paying jobs for those communities as the network is expanded and upgraded.

“This merger will also mean that thousands of T-Mobile workers will have an opportunity to choose the advantages of union membership. We in the UMWA believe that all workers should be able to enjoy the benefits collective bargaining brings to working families – fair wages, decent benefits, a voice at work and respect on the job.

“It’s long past time for T-Mobile workers to have a chance to win these improvements in their lives through union representation by our brothers and sisters in the Communications Workers of America. As it has in past mergers, AT&T is taking the responsible path and maintaining a neutral position with respect to efforts by its workers to organize a union.

“The UMWA applauds AT&T for its stance in this regard, and we urge T-Mobile workers to take advantage of this opportunity to help provide a more secure future for themselves

**Statement by AFL-CIO President Richard Trumka on Announced Acquisition of T-Mobile USA
by AT&T
March 21, 2011**

Yesterday's announcement of the acquisition of T-Mobile USA by AT&T has important, positive implications for consumers in the U.S. and Germany, for the U.S. telecom workforce and for our country's economic future.

The acquisition ensures AT&T a strong telecom workforce well-positioned to compete globally, while offering tens of thousands of T-Mobile USA employees the opportunity to make their jobs good jobs by benefitting from the pro-worker policies of AT&T, one of the only unionized U.S. wireless companies. AT&T partners with its employees so they have a voice on the job, good living standards, and training and development opportunities to help the company succeed. About 42,000 AT&T mobility employees are represented by the Communications Workers of America (CWA).

For T-Mobile USA workers who want a voice in their workplace, this acquisition can provide a fresh start with T-Mobile management. CWA and ver.di, the largest union in Germany, have partnered to support T-Mobile USA workers in their efforts to come together. The AFL-CIO will continue to work with CWA, ver.di and the global trade union movement to ensure that T-Mobile USA workers transitioning to AT&T will enjoy better employment security and a management record of full neutrality towards union membership and collective bargaining.

The acquisition also promises sorely needed increased broadband speed and build-out in the U.S., particularly rural communities, areas that have been highlighted by President Obama and the Federal Communications Commission as important to bring the U.S. to global parity. In Germany, the deal will allow for greater investment in parent Deutsche Telekom's own fiber network.

Contact: Jennifer Angarita (202) 637-5018



2414 I St. NW ~ Washington, D.C. 20037
web: www.uscattlemen.org ~ email: usca@uscattlemen.org
Telephone: (202) 870-3867

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

WT Docket No. 11-65

May 25, 2011

Dear Chairman Genachowski and Commissioners:

The United States Cattlemen's Association (USCA) is a national association of cow-calf producers and state associations whose mission is to present an effective voice for the domestic cattle industry. USCA's membership includes cow-calf operators, backgrounders, and feedlot operators. USCA was founded on the idea that a grassroots effort by U.S. cattlemen can work positively and effectively with the government to form domestic agriculture policy and thus ensure a fair, competitive marketplace. USCA believes that a marketplace should be based on transparency, strong competition, and increased opportunities for rural America.

To this end, USCA would like to make its voice heard concerning a recently announced transaction between AT&T and T-Mobile USA. A strong supporter of expanding mobile broadband throughout rural America, USCA believes this proposed transaction could significantly help accelerate that expansion.

Mobile broadband connections are fast becoming the lifeblood of American education, healthcare, business, and society in general, providing even the most remote user with access to information from all over the world. In some parts of rural America, cattlemen can communicate with cattle buyers as well as employees on the ranch, with the simple push of a button. Moreover, access to advanced mobile broadband has improved the lives of residents in small towns and rural America through access to education, healthcare, and more.

Unfortunately, in many parts of rural America mobile voice and broadband connections are faulty or non-existent, leaving many rural residents without access to the features mobile broadband connections offer. USCA believes positive steps that expand mobile broadband deployment to more Americans—such as the proposed merger between AT&T and T-Mobile—should be supported, and will go a long way toward covering those living rural areas that are

currently unserved or underserved. We believe this merger can help bring the kind of communications and infrastructure and innovation that rural America needs.

USCA wholeheartedly supports actions taken to expand mobile broadband access in small town and rural America. We would like to see to it that the ranchers and farmers, along with other rural residents who have traditionally been underserved, gain access to the best that mobile broadband has to offer, including expanded educational opportunities, telemedicine for the sick and disabled among us, and business applications that will help expand and improve small town and rural economies.

USCA believes that a transaction between mobile broadband providers that expands coverage for small town and rural America will provide faster and more reliable connections. These enhancements will spur the cutting edge wireless technology that enhances the business, educational, health, and social environment for both current and future generations of agricultural producers and rural America.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Ceballos", with a long horizontal flourish extending to the right.

President, U.S. Cattlemen's Association



Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

WT Docket No: 11-65

May 27, 2011

Dear Chairman Genachowski and Commissioners:

The United States Distance Learning Association (USDLA) was the first nonprofit Distance Learning association in the United States to support Distance Learning research, development and praxis across the complete arena of education, training and communications.

In 1987, the USDLA was founded on the premise of creating a powerful alliance to meet the burgeoning education and training needs of learning communities via new concepts of the fusion of communication technologies with learning in broad multidiscipline applications.

The learning communities that USDLA addresses are: pre K-12, higher education, continuing education, corporate training, military and government training, home schooling and telemedicine. In addition USDLA is also focused on national and international technology based distance learning. USDLA's mission is to meet the burgeoning education and training needs of learning communities via new concepts of the fusion of communication technologies with learning in broad multidiscipline applications. It is in furtherance of this mission that we offer our comments and support for the AT&T and T-Mobile merger, which will spread the most advanced 4G LTE wireless service to previously underserved communities.

This merger will transform the way educational content is delivered as mobile broadband will become vastly more powerful with the widespread introduction of 4G LTE wireless service. Not only will e-learners have instant access to information, but these e-learners will have the ability to collaborate in real-time.

8 Winter Street, Suite 508 • Boston, MA 02108-4705
Telephone: 800.275.5162 Fax: 617.399.1771
Website: www.usdla.org

Technology is the key to high quality distance learning. 4G LTE wireless technology has the power to connect students, teachers, and parents over vast distances instantaneously, allowing for real-time collaboration, instantaneous feedback, and active participation by parents and peers.

On a practical level the 4G LTE wireless technology that will become widespread as a result of the merger between AT&T and T-Mobile will allow e-learners to conduct research, download homework assignments, participate in classroom forums, and access vital course materials.

Most importantly, the merger will cover an additional 55 million potential e-learners, providing rural residents with access to modern communications technology that will connect them to the world. This point cannot be understated – this merger between AT&T and T-Mobile has the unique ability to quickly reach parts of rural America that are currently underserved.

The technological compatibility of AT&T and T-Mobile's networks allows advanced mobile broadband technology to be deployed quickly. This speedy deployment of 4G LTE technology will benefit distance learners eager to pursue a new career path, study at the finest universities in the world, or reduce the time spent commuting back and forth to a far away school.

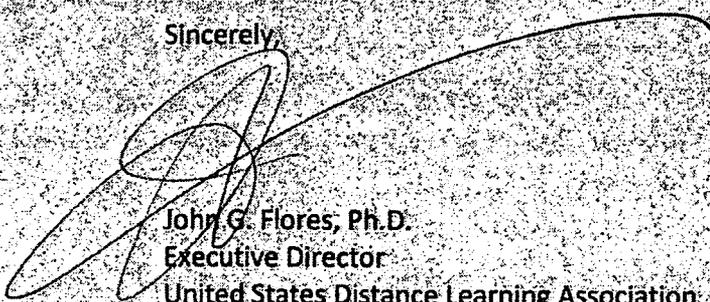
We support AT&T and its commitment to distance learning as the company offers solutions to enable large scale tablet and smartphone deployments for mobile distance learning programs. AT&T's commitment to distance learning is also evidenced by its offering of E-Learning Solutions, including AT&T Connect and AT&T Video Conference Service.

USDLA believes the proposed merger of AT&T and T-Mobile will ensure an additional 55 million Americans, and over 1 million square miles will receive access to mobile broadband technologies connecting a larger population of potential distance learners to the benefits distance learning affords.

This merger will enable more Americans to realize the benefits of distance learning through wireless devices, mobile apps, and other related educational tools. The AT&T and T-Mobile merger promises to further the cause of the USDLA and help the organization accomplish its mission.

For all the foregoing reasons the USDLA encourages the Federal Communications Commission to approve this merger without delay. Those hungering for distance learning opportunities are eager to begin the next chapter.

Sincerely,



John G. Flores, Ph.D.
Executive Director
United States Distance Learning Association

Marsha Mockabee
President & CEO



*Empowering Communities.
Changing Lives.*

**2930 Prospect Avenue
Cleveland OH 44115**

**P 216 622 0999 x201
F 216 622 0507**

**www.ulcleveland.org
mmockabee@ulcleveland.org**

May 23, 2011

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket 11-65

Dear Chairman Genachowski and Commissioners,

The Urban League of Greater Cleveland is a non-profit social service organization that seeks to improve the economic, cultural, social and educational conditions affecting all citizens of Cuyahoga County. We support the merger of AT&T and T-Mobile to provide high-speed technologies that will help the economic and educational development in our community.

At our organization, we're proud of Operation Urban Impact. This is an after school, blended learning environment to help students receive OGT, SAT and ACT instruction and dropout prevention support. Increased mobile broadband coverage from this merger will benefit these students and supply more opportunities to connect to educational resources and services.

Expanded coverage means more ways for people to connect in rural as well as urban areas. In fact, with this merger, 4G LTE coverage will extend to an additional 55 million Americans and cover more than one million additional square miles beyond AT&T's current plans.

I hope that you will support this merger and its lasting and positive impact on our community. Our children are our future and the educational opportunities this merger brings will help so many students succeed.

Sincerely,

A handwritten signature in cursive script that reads "Marsha Mockabee".

Marsha Mockabee
President & CEO



Columbia
Urban League

1400 Barnwell Street
Columbia, SC 29201

P 803 799 8150
F 803 254 6052

www.columbiaurbanleague.org

*Empowering Communities
Changing Lives.*

May 26, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 11-65

Dear Chairman Genachowski and Commissioners:

On behalf of the Columbia Urban League, I am writing today to urge you to support AT&T's recently announced merger with T-Mobile. The Urban League is the nation's oldest and largest community-based movement devoted to empowering African Americans to enter the economic and societal mainstream. Technology is one of the best ways to achieve this goal, and we are confident the combined assets of AT&T and T-Mobile will immensely aid that goal.

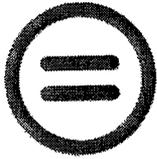
The combined capabilities of AT&T and T-Mobile will improve and expand mobile network capacity, offering greater reliability in our service areas of the City of Columbia, Fairfield, Florence, Kershaw, Lee, Lexington, Orangeburg, Richland, and Sumter counties of South Carolina. In our work, we are often witness to the obstacles minority Americans face when trying to access mobile broadband and its associated benefits. This deal would help extricate the barriers keeping our members from attaining these benefits, working towards the end of the digital divide.

Please support the merger of AT&T and T-Mobile, which will help Columbia bridge the digital divide and expand opportunity for many minorities in Columbia and across South Carolina.

Sincerely,


James T. McLawhorn, Jr.
President and Chief Executive Officer

JTMjr/ch



Urban League of
Greater New Orleans

*Empowering Communities.
Changing Lives.*

May 25, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

WT 11-65: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations

Dear Chairman Genachowski and Commissioners:

For over seventy years, the Urban League of Greater New Orleans (ULGNO) has focused on empowering the community and changing lives through a myriad of services to the greater New Orleans region. Extended after school programs, employment and training, financial literacy, and entrepreneurship development are just a sample of the programs and services offered. ULGNO employs a three-prong strategy focused in the following areas: youth & education, community & economic development, and policy & social justice.

The National Urban League is a historic civil rights organization dedicated to economic empowerment in order to elevate the standard of living in historically underserved urban communities. Founded in 1910 and headquartered in New York City, the National Urban League spearheads the efforts of its local affiliates through the development of programs, public policy research and advocacy. Our national organization provides services that impact and improve the lives of more than 2 million people nationwide.

We firmly believe that the greater New Orleans area we serve would greatly benefit by added broadband connectivity. Studies show that the underserved, urban communities with the greatest access to broadband Internet see the strongest economic growth. With high-speed Internet, residents can more easily access important resources online, from educational resources for schools to job opportunities for those who are out of work or seeking to update their skills. High-speed Internet enables greater connectivity between all stakeholders, more able to respond effectively and efficiently to the needs of our city.

For these reasons we support the merger of AT&T and T-Mobile – and encourage you to support it, too.

Sincerely,

Nolan V. Rollins
President & CEO
Urban League of Greater New Orleans

CC: Chairman Julius Genachowski Commissioner Robert McDowell
Commissioner Michael Copps Commissioner Mignon Clyburn



Urban League
of Portland

May 25, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

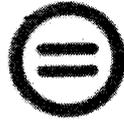
Re: WT Docket 11-65

Dear Chairman Genachowski and Commissioners:

The Urban League of Portland is one of the region's most respected social service and civil rights organizations, operating for almost 70 years. It is a nonprofit, community-based organization headquartered in north Portland and an affiliate of the National Urban League. The League helps empower African Americans and others to achieve equality in education, employment and economic security through a combination of direct services, outreach and advocacy.

Access to information, technology and opportunity are keys to empowerment. The Urban League of Portland supports the merger of AT&T and T-Mobile because their combined networks will provide better service and is arguably the most expeditious route to the next generation of mobile broadband services. Network infrastructure may appear to only be wires, cell towers and radio waves, but those wires and towers lead to jobs, education, better healthcare and meaningful connections.

We are also encouraged by the combination of these two particular companies. AT&T has 42,000 unionized workers. T-Mobile employees will soon enjoy the same protections and bargaining power enjoyed by their represented colleagues at AT&T. Furthermore, AT&T has a strong commitment to increasing opportunities for women- and minority-owned businesses, and strives to ensure that AT&T workers reflect the demographics of the communities in which they serve. They will continue to work with the Urban League of Portland and others to hire, train and promote a diverse workforce.



Urban League
San Diego County

720 Gateway Center Drive
San Diego, CA 92102

P 619.263.3115
F 619.263.3660

*Empowering Communities.
Changing Lives.*

May 31, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: In the Matter of applications of AT&T Inc. and Deutsche Telekom AG for consent to assign or Transfer Control of licenses and Authorizations (WT Docket No. 11-65).

Dear Chairman Genachowski:

Empowerment and building connections are two of the primary goals of The Urban League of San Diego County, and as advocates for the 7,000 African-Americans that we serve as well as displaced minorities everywhere, we are writing to express our strong support of the merger of T-Mobile USA and AT&T.

The expanded mobile broadband network coverage that will result from the merger will provide greater service to our constituents and our nation, helping President Obama reach his goal of American progress in mobile broadband coverage. We strongly believe that the state and national economy and the underserved in urban areas across the country will benefit from this expanded service and its increased reliability.

As an African American advocacy group, we also respect AT&T's long history and commitment to diversity, which includes its employees and suppliers. We urge you to support this merger and ensure a swift approval process.

Thank you for your consideration.

Sincerely,

Ray King, President and CEO
The Urban League of San Diego County

CC:

Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell



Urban League of
Metropolitan Denver

2015 York Street, Denver CO 80205
Office: 303.377.2790 Fax: 303.377.2794
denverurbanleague.org

*Our mission is to help African
Americans and other residents of metro
Denver attain social and economic
equality and self-reliance.*

Chairman Julius Genachowski:
Commissioner Michael J. Copps:
Commissioner Robert M. McDowell:
Commissioner Meredith Attwell Baker:
Commissioner Mignor Clyburn:

Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: WT Docket 11-65

May 25, 2011

Dear Chairman Genachowski and Commissioners:

The Urban League of Metropolitan Denver strongly supports the proposed merger of AT&T and T-Mobile. We understand that through the merger over 95% of Colorado will have mobile broadband access through the 4G LTE network. Colorado currently ranks 42nd in broadband availability leaving many communities behind.

We believe in President Obama's goal to "connect every part of America to the digital age," promoting economic growth, investment and job creation. But we are also realistic in knowing that it takes private investment to make the goal a reality for everyone. The proposed merger will give mobile broadband access to an additional 900,000 Coloradans. This investment in our state is needed in the current economy.

Since 1946, the League has worked aggressively to create a level playing field for African Americans and others of all ethnic and cultural backgrounds. Today, the Urban League is implementing innovative programs to prepare our constituents for the new millennium. We serve as a liaison between the business community, city and county governments and other community-based organizations that share its concern for the welfare of the economically disadvantaged in Denver.

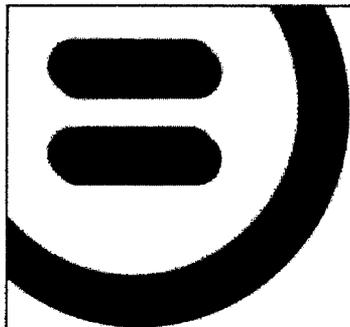
With the evolution of technology, bridging the digital divide has not been more important than it is today. Children from all economic backgrounds, in rural and urban areas, need access to broadband to survive, let alone compete, in today's world. Access is needed for large and small business to compete on equal footing in the global marketplace. We must look towards solutions that can help bridge that gap.

We respectfully ask for your support of the merger to benefit all of Colorado's communities.

Sincerely,

Landri Taylor
Urban League of Metropolitan Denver





Urban League
of Metropolitan St. Louis, Inc.
Empowering Communities. Changing Lives.

James H. Buford
President/CEO

Officers 2010-2011

- Stephen C. Jones
Chairman
- Jo Ann Arnold
Vice-Chairman
- Debra Denham
Treasurer
- Edward Higgins
Secretary
- Mark Levison
General Counsel

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

May 20, 2011

Re: WT Docket 11-65

Dear Chairman Genachowski:

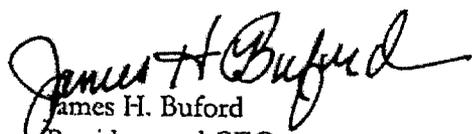
On behalf of the Urban League of Metropolitan St. Louis I would like to emphasize the importance of delivering expanded access to high-speed wireless services and urge your support of the proposed merger between AT&T and T-Mobile.

These services are vital for minority and low-income Americans to succeed in the modern technology-based economy. Yet, too often, minority Americans hit a roadblock when it comes to using the Internet and the many benefits it delivers in areas like health care, education, and jobs. This agreement provides the promise of better service and greater access to fast wireless Internet service.

In fact, should this merger go through, AT&T will be able to expand its 4G LTE deployment to more than 97 percent of the nation's population in rural and urban areas. That will go a long way toward meeting President Obama's goal of providing access to high-speed broadband service to everyone in America.

That is a deal we can certainly support and we hope that you will do so as well.

Respectfully,


James H. Buford
President and CEO

CC:

- Commissioner Michael Copps
- Commissioner Robert McDowell
- Commissioner Mignon Clyburn
- Commissioner Meredith Attwell Baker

Board of Directors

- Dr. Ed Adams
- Dr. Robert Archibald
- Jo Ann Arnold
- Velma Bailey
- Andrew Baker
- Richard Banks
- Rebecca Barnes
- Steven M. Barney
- Lynn Beall
- Robert E. Bell
- Michael Burns
- Jack Carey
- Christine Chadwick
- Karen Davis
- Debra Denham
- Melanie DiLeo
- Frankie Eichenberger
- Richard Eichwald
- Dave Ervin
- Rabbi Randy Fleisher
- Richard Fleming
- Frankie M. Freeman
- Johnny Furr, Jr.
- Astrid Garcia
- Dr. Henry Givens, Jr.
- Dr. Dennis Golden
- Michael Green
- Frank Hamsher
- Dr. Zelema Harris
- Edward Higgins
- Debra Hollingsworth
- Rhonda Hunter
- Thomas Irwin
- Allan D. Ivo, IV
- Reverend Sammie Jones
- Stephen C. Jones
- Anthony Kinslow
- Roman Kulich
- Mark Levison
- John Lyday
- Ann Marr
- Patrick McNamee
- Richard H. Miles
- Tony Moise
- Sandra Moore
- John Moten, Jr.
- Kathleen T. Osborn
- Daniel Paquin
- Emily Pitts
- Dr. Constance Rockingham
- William Rusnack
- Todd R. Schnuck
- Bryan Scott
- Ellen Sherberg
- Armando Sanceo-Roman
- Dr. John W. Sisco, III
- Dr. Elizabeth Stroble
- Andrew Stroud
- Dr. Donald Suggs
- Kevin Taylor
- Michelle Tucker
- Kira Van Nieu
- Thomas Voss
- Robert E. Wallace
- Keith Williamson
- Dr. Karl Wilson
- Donald L. Wolff
- Col. William H. Young



Affiliated with the National Urban League

Proud member of

United Way
of Greater St. Louis





CITY HALL

1110 West Capitol Avenue
West Sacramento, CA 95691

City Council
City Manager
City Clerk
Human Resources
(916) 617-4500
Fax (916) 372-8765

Information Technology
(916) 617-4520
Fax (916) 372-8765

Community Development
Planning
Engineering
(916) 617-4645
Fax (916) 371-0845

Building
(916) 617-4683
Fax (916) 371-0845

Parks & Recreation
(916) 617-4620
Fax (916) 372-5329

Redevelopment
Economic Development
(916) 617-4535
Fax (916) 373-5848

Grants & Community Investment
(916) 617-4555
Fax (916) 372-1584

Finance
(916) 617-4575
Fax (916) 373-9006

Utilities
(916) 617-4589
Fax (916) 373-9006

Refuse & Recycling
(916) 617-4590
Fax (916) 373-9006

Fire Administration
(916) 617-4600
Fax (916) 371-5017

POLICE
550 Jefferson Blvd
West Sacramento, CA 95605
Police
(916) 617-4900
Fax (916) 373-2377
Code Enforcement
(916) 617-4927

PUBLIC WORKS
1951 South River Road
West Sacramento, CA 95691
(916) 617-4850
Fax (916) 371-1516

www.ci.west-sacramento.ca.us

May 19, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WT Docket-11-65

Dear Chairman Genachowski,

Effective communications capabilities are the life blood of public safety. Public safety professionals and the general public have become more and more reliant on wireless technology. With so many people cutting the cord on home phones, wireless has become their only means of contacting first responders in an emergency. We must ensure that wireless services have the capacity to meet that need in a reliable manner.

Natural disasters have become common place and public safety networks can become damaged and unusable. However, many commercial networks have the durability and capability essential for emergency responders. The AT&T-Mobile merger is a way to achieve the same durability and capability for emergency responders who could communicate much quicker and more efficiently with their control centers. Not only would the merger positively impact emergency responders, but the new company plans to expand LTE coverage to over 97 percent of the population, covering more towns and small cities than ever before.

A wider coverage map with greater network capacity will help save the lives of more people and meet the needs of America's first responders. Delaying an important decision such as this will only be to the detriment of our citizens. I urge your immediate support of this merger to help protect more American lives.

Sincerely,

Chief Dan Drummond
West Sacramento Police Department

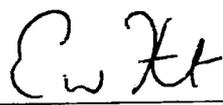
CC:
Commissioner Mignon Clyburn
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Meredith Attwell Baker

STATEMENT OF ERIC HUNT (WELCH ALLYN)

1. I am the Chief Information Officer of Welch Allyn. Welch Allyn is a leading manufacturer of frontline medical diagnostic equipment and medical products for physicians, hospitals, emergency medical technicians and other healthcare providers. I am responsible for the entire technological breadth of the company, including, but not limited to local area networks, call centers, sales force automation, high-speed internet, fixed-line, mobility, telecom, and teleconferencing.
2. In terms of our mobility needs, we purchase wireless voice and data services and mobile devices (primarily Blackberries) through a CL (corporate liable) account for approximately 500 mobile users. Our spending on mobility with AT&T and Verizon is substantial. We have mobility business with other carriers, including Verizon and, to a much lesser extent, T-Mobile, but the majority of our business is with AT&T.
3. In my view, there are competitive domestic alternatives to AT&T, but I do not consider T-Mobile to be one of them. T-Mobile does not have nearly enough coverage for our company's strategic needs to be considered as a viable alternative to AT&T.
4. One major reason I am supportive of the proposed transaction between AT&T and T-Mobile USA is the likelihood of improved domestic network coverage. Supplementing AT&T's coverage with T-Mobile's network will be ideal. For us, having a single carrier that can accommodate all of our company's telecom needs including having a strong network with the capacity and coverage to efficiently move our data is paramount.
5. Another benefit of the proposed transaction will be the efficiencies of scale that will yield combined investment in infrastructure. The merger will make possible the investment in the next generation of technology which will result in better service and value for the customer.

I declare under penalty of perjury the foregoing is true and correct to the best of my knowledge.

Date: 5/26/2011



Eric Hunt

West Virginia Farm Bureau



One Red Rock Road, Buckhannon, WV 26201
Phone: (304) 472-2080, (800) 398-4630
Fax: (304) 472-6554

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairperson Genachowski and Commissioners Copp, McDowell, Clyburn and Baker:

As West Virginians fight lingering unemployment and dig deeper into their pocketbooks for gas and commodities, most of us would welcome new opportunity – and lower prices. That trend may be just over the horizon, thanks to the pending merger between AT&T and T-Mobile.

What does this merger mean for West Virginia? In underserved markets like ours, consumers will benefit from the decade-long trend of falling prices as wireless carriers combine. Plus, increased broadband availability spurs job creation and provides people with increased economic advantages as well as educational and professional opportunities. Americans in rural or low-income areas – which currently have less access to wireless technology – should benefit the most from this consolidation.

In fact, industry experts estimate that a combined AT&T/T-Mobile can make wireless Internet available to more than 97 percent of Americans, including those in small or rural communities. That's significant for West Virginia. That's why we at the West Virginia Farm Bureau support this merger on behalf of the 23,000 members we represent.

For the modern farmer, the benefits and possibilities of broadband are vast. Farmers can use high-speed Internet to track markets, research equipment and methods, and communicate with markets around the world. They can also develop and expand their farms with web-based sales, which allow farmers to sell directly to markets and individual customers around the world. To competitively manage a farm, wireless technology is now a necessity.

West Virginia farmers will be pleased to discover the faster connection speeds, lower latency, higher network capacity, and improved voice and data services that result from this merger. These benefits promise to improve farmers' communication with their workers, colleagues, and suppliers. And more efficient communication means improved productivity, driving down costs.

Yet increased wireless access is important for more than the needs of our bank accounts. It also appeals to our basic sense of fairness. Quite simply, West Virginians – and all Americans who live in rural communities – deserve equal access to broadband services.

Without it, many will remain disconnected from the opportunities this technology delivers.

That includes our unemployed men and women whose families continue to struggle as they search for work. That includes our young people, who are completing school and looking for job opportunities, and our educators, who need to connect with colleagues and access resources to keep themselves and their students informed. While West Virginia's farms are supplying food and fiber to our state's families, greater access to wireless broadband will be sustaining their connection to opportunity.

West Virginia Farm Bureau supports the AT&T merger with T-Mobile as a key to realizing these goals. Combining the resources of these two companies will give our farmers – and all West Virginians – access to new possibilities.

Sincerely,

A handwritten signature in cursive script that reads "Charles Wilfong".

Charles Wilfong
President



May 5, 2011

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

Dear Ms. Dortch,

In response to the Federal Communications Commission's decision to open a proceeding for public comment on the AT&T purchase of T-Mobile USA, we wish to submit the attached blog post from our website indicating our support of the deal.

We ask that you would please include our blog post in the record for the following proceeding, WT 11-65.

Sincerely,

Barbara Kasoff
President/CEO,
Women Impacting Public Policy



AT&T Plans to Acquire T-Mobile

5:34 PM March 20, 2011

Interesting news today on AT&T's announcement of its intent to acquire T-Mobile USA and one that stands to serve consumers and small businesses well. Small businesses need a reliable and dependable network to conduct businesses and, as indicated in its Economic Blueprint (www.wipp.org), greater accessibility and affordability. Mobile usage is growing rapidly, but frankly, as technology and the use of the internet evolve, growth is only in its early stages - we can only speculate on the resources needed to satisfy consumer demand. I'm hoping to see AT&T's commitment to an expanded 4G network and increased accessibility come to fruition with this acquisition.

<http://blog.wipp.org/2011/03/interesting-news-today-on-atts/>



3075 Adeline Street • Suite 280 • Berkeley, CA 94703-2545-1500 • <http://www.wid.org>
TELEPHONE: 510-225-6400 FAX: 510-225-0477 TTY: 510-225-0478

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

WT Docket No. 11-65

May 27, 2011

Dear Chairman Genachowski and Commissioners:

The mission of the World Institute on Disability (WID) in communities and nations worldwide is to eliminate barriers to full social integration and increase employment, economic security and health care for persons with disabilities. WID creates innovative programs and tools; conducts research, public education, training and advocacy campaigns; and provides technical assistance. Pursuant to WID's mission we present the Federal Communications Commission (Commission) with our views on the AT&T and T-Mobile merger.

As a consequence of the AT&T and T-Mobile merger, many more persons with disabilities across the United States will gain access to the nation's largest 4G LTE network. This access will provide these people with the opportunity to avail themselves of a more modern, more responsive, more innovative and more interactive wireless network with the ability to adapt to their various needs and overcome their disabilities. WID has no doubt that the 4G LTE network will change the lives of persons with disabilities for the better.

For example, people with low vision or hearing loss will benefit from this latest generation of mobile broadband technology because it will provide the opportunity to use text to speech applications and provide the opportunity for multiple users to sign via the real-time video capabilities. The possible applications for people with other disabilities are seemingly endless. Consider persons with mobility issues who will be able to use voice commands to control movement and summon assistance when needed. There is little doubt that the technology enabled by this merger will create a multitude of opportunities for persons with disabilities.

4G LTE's speed, functionality, and availability of specific applications enables users with a mobile phone to socialize, work, manage their finances and seek healthcare all from a device the size of a wallet. WID wants to see 4G LTE devices in the

possession of persons with disabilities forthwith. WID agrees with AT&T and T-Mobile that the fastest way to disseminate 4G LTE over the largest area possible is by allowing this merger to proceed, a merger that will provide many in the disability community with access to new resources that will open doors to new opportunities.

For the sake of providing a complete assessment of this merger it must be pointed out that AT&T has a stellar record when it comes to providing access and opportunities to people with disabilities. This effort has been highlighted in G3ICT's White Paper, "Accessibility, Innovation and Sustainability at AT&T: A G3ict White Paper Documenting How Mobile Service Providers Can Serve Persons with Disabilities and Seniors ([http://g3ict.org/resource_center/White Paper on Accessibility, Innovation and Sustainability at AT&T](http://g3ict.org/resource_center/White_Paper_on_Accessibility,_Innovation_and_Sustainability_at_AT&T)). At the completion of the merger between AT&T and T-Mobile, T-Mobile customers will be able to take advantage of all that AT&T has to offer to the disability community, including a wider selection of handsets and specialized customer service.

WID calls on the Commission to approve the merger between AT&T and T-Mobile, placing special emphasis on AT&T's commitment to the disability community.

WID thanks the Commission for the opportunity to comment on this very important merger.

Sincerely,



Anita S. Aaron, Executive Director
World Institute on Disability

Supporting Statements of Third Parties Not Filed With the FCC

American Consumer Institute,
<http://theamericanconsumer.org>

- Merger is pro-competition and benefits the consumer

American Enterprise Institute,
<http://blog.american.com>

- Merger is pro-competition and good for innovation

Americans for Tax Reform, Digital Liberty
<http://digitalliberty.net>

- Merger is pro-competition and benefits the consumer

Competitive Enterprise Institute,
<http://blogs.forbes.com>

- Merger is pro-competition and benefits the consumer

Forbes, Bret Swanson, Maximum Entropy,
<http://blogs.forbes.com>

- Benefits consumer

Forbes, John Tamney, Political Economy
<http://blogs.forbes.com>

- Merger is pro-competition and benefits consumer

The Free State Foundation
<http://freestatefoundation.blogspot.com>

- Merger is pro-competition and best means of meeting rapid demand in growth

The Heritage Foundation
<http://blog.heritage.org>

- Merger is pro-competition and best means of meeting rapid demand in growth

High Tech Forum
<http://hightechforum.org>

- Benefits consumer and best means of meeting rapid growth in demand

Information Technology and Innovation Foundation
<http://innovationpolicy.org>

- Merger is pro-competition and best means of meeting rapid demand in growth

Larry Downes, Consultant,
<http://news.cnet.com>

- Merger is pro-competition and best means of meeting rapid demand in growth

MediaFreedom.org

<http://mediafreedom.org>

- Benefits consumer

National Review Online, Douglas Holtz-Eakin,

<http://nationalreview.com>

- Merger is pro-competition and good for innovation

Navigant Economics

<http://blogs.hbr.org>

- Merger is pro-competition and benefits consumer

Politico, Robert Hahn & Peter Passell

<http://politico.com>

- Best means of meeting rapid growth in demand

The Precursor Blog, Scott Cleland

<http://precursorblog.com>,

“AT&T - T-Mobile: Opponents Have Competition Double Standard”

- Merger is pro-competition and best means of meeting rapid demand in growth

“AT&T - T-Mobile: A Solution to Many Problems”

- Benefits rural communities and best means of meeting rapid demand in growth

Progressive Policy Institute

<http://huffingtonpost.com>

- Good for economic development and Job Stimulation

Recon Analytics

<http://fiercewireless.com>

- Best means of meeting rapid demand in growth

Representative Corrine Brown, 3rd Congressional District of Florida,

<http://corrinebrown.house.gov>

- Benefits consumers and good for economic development and job stimulation

Small Business & Entrepreneurship Council

<http://sbecouncil.org>

- Good for economic development and innovation
- Benefits rural communities and best means of meeting rapid growth in demand

The Wall Street Journal, Holman Jenkins, Jr.

<http://online.wsj.com>

- Benefits consumer and best means of meeting rapid growth in demand

Wireless Communication Association,

<http://bitsonbroadband.com>,

“AT&T/T-Mobile Transaction Best for Mobile Wireless Broadband”

- Benefits consumers and best means of meeting rapid growth in demand

Wireless Communication Association

<http://bitsonbroadband.com>,

“Hal Singer’s Blog Post on T-Mobile’s Ability to Discipline Prices”

- Merger is pro-competition and benefits the consumer

100

**BLACK MEN
OF AMERICA, INC.**

What They See Is What They'll Be[®]

**LEADERSHIP &
EXECUTIVE COMMITTEE**

ALBERT E. DOTSON, JR., ESQ.
Chairman of the Board

CURLEY M. DOSSMAN, JR.
Vice Chairman of Operations

DR. HOWARD S. RASHEED
Vice Chairman of Programs

JOHN S. KENDALL, ESQ.
Vice Chairman of Development

FRANK L. HAYES
Vice Chairman of Finance

ANTHONY B. O'NEILL, SR., ESQ.
Secretary

JAMES "MAC" HUNTER, ESQ.
General Counsel

MARVIN R. DICKERSON
Member At Large

ROBERT B. TAPLEY
Member At Large

DR. LADELLE OLION
Member At Large

JEFFERY L. JACKSON
Member At Large

PHILIP BANKS, JR.
Member At Large

KEVIN L. PATTERSON
Conventions & Meetings Chair

SAMUEL A. HORTON
Evaluations Committee Chairman

MURVIN S. ENDERS
Chapter Development Committee Chairman

DR. WILLIAM H. HAYLING
President Emeritus

NATHANIEL R. GOLDSTON, III
President Emeritus

THOMAS W. DORTCH, JR.
Chairman Emeritus

**PRESS RELEASE
March 22, 2011**

FOR IMMEDIATE RELEASE

Statement by the 100 Black Men of America, Inc., Chairman Albert E. Dotson, Jr., Esq. on Announced Acquisition of T-Mobile USA by AT&T

[Atlanta, GA]—"With African American unemployment still hovering above 15%, we welcome the news of AT&T's proposed acquisition, which holds the promise of new jobs, entrepreneurship and increased prospects for economic development," said Chairman of the 100 Black Men of America, Inc., Albert E. Dotson, Jr., Esq.

"As AT&T works with T-Mobile to extend its network to 249 million Americans - roughly 95 percent of the population - we anticipate opportunities arising for minority suppliers, vendors, community partners, and for mobile content and application developers," said Dotson.

"Our communities have increasingly come to rely on mobile connectivity as the primary access point for broadband adoption. And with greater speeds available to more areas at competitive rates, we are encouraged that this deal will foster faster broadband deployment and adoption by people of color, especially those who have been historically underserved," concluded Dotson.

###

141 Auburn Avenue
Atlanta, Georgia 30303
(404) 688-5100
Fax (404) 688-1028
Website: www.100blackmen.org

Mentoring the 100 Way *ACROSS A* LifetimeSM

100

BLACK MEN
OF AMERICA, INC.

What They See Is What They'll Be®

April 19th 2011

LEADERSHIP &
EXECUTIVE COMMITTEE

ALBERT E. DOTSON, JR., ESQ.
Chairman of the Board

CURLEY M. DOSSMAN, JR.
Vice Chairman of Operations

DR. HOWARD S. RASHEED
Vice Chairman of Programs

JOHN S. KENDALL, ESQ.
Vice Chairman of Development

FRANK L. HAYES
Vice Chairman of Finance

ANTHONY B. O'NEILL, SR., ESQ.
Secretary

JAMES "MAC" HUNTER, ESQ.
General Counsel

MARVIN R. DICKERSON
Member At Large

ROBERT B. TAPLEY
Member At Large

DR. LADELLE OLION
Member At Large

JEFFERY L. JACKSON
Member At Large

PHILIP BANKS, JR.
Member At Large

KEVIN L. PATTERSON
Conventions & Meetings Chair

SAMUEL A. HORTON
Evaluations Committee Chairman

MURVIN S. ENDERS
Chapter Development Committee Chairman

DR. WILLIAM H. HAYLING
President Emeritus

NATHANIEL R. GOLDSTON, III
President Emeritus

THOMAS W. DORTCH, JR.
Chairman Emeritus

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch,

It has come to our attention that the FCC has opened a docket to allow for public comments on the recently announced acquisition of Deutsche Telekom's T-Mobile USA by AT&T. Please find enclosed a statement from our Chairman, Albert E. Dotson Jr., announcing our support of the acquisition.

We would ask, respectfully, that these comments be included in the appropriate docket, WT 11-65.

Regards,

100 Black Men of America

CC: Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Rick Kaplan, Chief Counsel and Senior Legal Advisor for Chairman Genachowski
John Giusti, Chief of Staff and Legal Advisor for Wireless, Public Safety and International for Commissioner Copps
Angela E. Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless & International for Commissioner McDowell
Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety for Commissioner Clyburn
Charles Mathias, Senior Legal Advisor, Wireless, International and Public Safety Issues for Commissioner Baker

141 Auburn Avenue
Atlanta, Georgia 30303

(404) 688-5100

Fax (404) 688-1028

Website: www.100blackmen.org

Mentoring the 100 Way *Across A Lifetime*™

May 27, 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Jobs, Economic Growth and the AT&T-T-Mobile Merger

Dear Chairman Genachowski:

We are among the companies that employ and create jobs for thousands of workers who together create a robust hi-tech and technology engine for growth. As we operate in a challenging economic climate, it is vital that federal regulators take a leading role in adopting policies that establish the right incentives to create new jobs and promote economic growth. Nowhere is this more relevant and timely than Washington's oversight of federal telecommunications policy. As the Commissioners know from first-hand experience, jobs and capital investment in the telecommunications industry, especially in the wireless industry, have shown remarkable resilience during the past few years.

In the wireless industry alone, capital expenditures increased 19.4% from 2009 to 2010,ⁱ as carriers continued to upgrade their networks to meet growing consumer demand. Moreover, capital intensity (capex/wireless revenues) is at its highest level since late 2008 as carriers continue deploying advanced 4G LTE networks.ⁱⁱ

Collectively, our companies employ large numbers of Americans in manufacturing, construction and engineering, network infrastructure, IT, software development, and other fields that benefit from a robust communications industry. Our companies have grown in part because current federal policies encourage network infrastructure investment and the rapid deployment of new technologies and because network operators work closely with us to bring new services and products to market as quickly as possible. As a result, our companies can maintain good jobs that sustain multiple communities.

At the same time, we are mindful of the Commission's warnings regarding imminent spectrum exhaust and its potential negative impact on our nation's fragile economy. Our concern for maintaining the vibrancy of America's communications market is what motivates us to write in strong support of the proposed AT&T-T-Mobile merger.

As President Obama has said, all Americans deserve access to the benefits made possible by high-speed Internet services. This includes access to education, healthcare and entertainment. We support the President's goals for this connected future, as contained in both his own statements and the FCC's National Broadband Plan.

Given our nation's size and the federal government's fiscal realities, the best way to fulfill the President's goals is to encourage private investment and deployment of new network technologies. The AT&T-T-Mobile merger offers a clear path to that reality, as AT&T has committed to an incremental \$8B investment to deploy advanced 4G LTEⁱⁱⁱ networks to an additional 55 million Americans once the merger is approved.^{iv} The infrastructure investment required to meet that commitment will produce and sustain jobs throughout the telecommunications industry and improve America's overall economic growth. For businesses such as ours, anything that accelerates deployment of new wireless technologies also means jobs and economic growth can be sustained.

Because AT&T has led the way in wireless innovation, its network is now facing unique challenges from the exponential growth in data traffic it has experienced – up 8,000% from 2007 to 2010.^v Quite simply, capacity constraints would reduce AT&T's ability to deploy and develop innovative services.

Here again, the merger will help move innovation forward. The combination of the networks will quickly provide the functional equivalent of new spectrum to assuage short-term issues associated with impending spectrum exhaust.^{vi} And AT&T's aggressive plans for deployment of LTE will provide greater incentives for all wireless companies to innovate, resulting in a virtuous cycle of innovation.^{vii}

If the Commission decides to approve the AT&T-T-Mobile merger, that vote will not only help fulfill President Obama's pledge to expand access to high-speed broadband, it will also promote economic growth and jobs. While we respect the Commissioners' need to conduct a full review, we believe the economic and technical evidence supporting the merger is overwhelming. Accordingly, we urge a prompt approval of the merger.

Thank you for your consideration.

Sincerely,
Accenture
Acme Packet, Inc.
ACT Teleconferencing, Inc.
A D Technologies
ADTRAN
Advanced Call Center Technologies, LLC
AFL Telecommunications
Alpha Technologies Ltd.
Amdocs
Artel Video Systems
Aspen Marketing Services, Inc.
Avaya, Inc.
BGN Limited
Black Box Network Services
Brocade Communications Systems, Inc.
Canoga Perkins Corporation

Ceragon Networks, Inc.
Check Point Software Technologies, Ltd.
Communications Test Design, Inc.
Compucom Systems, Inc.
Convergys Corporation
D-Link Systems
Dieste
Dimension Data, Americas
Directory Distributing Associates, Inc.
Emerson Network Power
FEI-Zyfer, Inc.
Fujitsu Network Communications, Inc. (FNC)
GENBAND
GENCO ATC
General Dynamics Wireless Services
Global Energy & Technology, Inc.
Good Technology
Hacker Group
Hubbell-Pulsecom
Interactive Digital Solutions
Interbrand
iStreamPlanet Co.
Javelin Marketing Group
JDS Uniphase Corporation
Johnson Controls, Inc.
Madison Group, Inc.
The Marketing Arm
MEC
Metaswitch
NSC Global Limited
Oberther Technologies of America Corp.
OFS
Optelian Access Networks, Inc.
Option NV
Pace Americas
Pantech Wireless, Inc.
Personal Communications Devices, LLC
Research in Motion
Rodgers Townsend
R.R. Donnelley
Schwerdt Design Group, Inc.
ScanSource, Inc.
Securematics
Sedgwick Claims Management Services
Shoretel, Inc.
Sierra Wireless Inc.

SOLUTIONSET
Sonus Networks, Inc.
Star Tek, Inc.
Superior Essex Communications, LP
Sutherland Global Services Inc.
Sykes Enterprises, Incorporated
Symmetricom, Inc.
Synchronoss Technologies, Inc.
TE Connectivity
Tech Mahindra, Limited
Tekelec
Telecom Assistance Group
Tellabs Operations, Inc.
Telmar Network Technology
UltiSat, Inc.
Volt Information Sciences, Inc.
Wipro Technologies
York Telecom Corporation

ⁱ BOA/Merrill Lynch "US Wireless Matrix 2Q10" report issued on August 27, 2010 -- pages 33 and 34

ⁱⁱ BOA/Merrill Lynch "US Wireless Matrix 2Q10" report issued on August 27, 2010 -- pages 33 and 34

ⁱⁱⁱ AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

^{iv} AT&T Public Interest Statement, pg. 1; <http://mobilizeeverything.com/pdfs/PUBLIC-PIS%20FINAL.pdf>

^v <http://mobilizeeverything.com/datavolumes.php>

^{vi} AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

^{vii} AT&T Press Release, "AT&T Files Public Interest Statement with FCC on T-Mobile Acquisition," April 21, 2011; http://mobilizeeverything.com/press_releases/AT_T_to_Acquire_T-Mobile_USA_From_Deutsche_Telekom.pdf

Print This E-Mail This

Search Statements & Releases

Keywords

GO

OR

Type

Month

Year

Leadership

GO

MEDIA CONTACTS

- Josh Goldstein  
- Amaya Tune  

General Inquiries:
AFL-CIO Media Outreach
Department, 202-637-5018

FOLLOW US

Connect:    

Sign up to receive e-mail alerts:

- AFL-CIO Media Releases
- AFL-CIO Now Blog
Daily blog roundup on important news and updates critical to working families.

Enter e-mail

[Update your e-mail.](#)

LINK TO US

Web button and banners:
Use them to provide a link back to the AFL-CIO websites.

Press Releases, Speeches & Testimony

Home > Media Center > Press Releases, Speeches & Testimony

Statement by AFL-CIO President Richard Trumka on Announced Acquisition of T-Mobile USA by AT&T March 21, 2011

Yesterday's announcement of the acquisition of T-Mobile USA by AT&T has important, positive implications for consumers in the U.S. and Germany, for the U.S. telecom workforce and for our country's economic future.

The acquisition ensures AT&T a strong telecom workforce well-positioned to compete globally, while offering tens of thousands of T-Mobile USA employees the opportunity to make their jobs good jobs by benefiting from the pro-worker policies of AT&T, one of the only unionized U.S. wireless companies. AT&T partners with its employees so they have a voice on the job, good living standards, and training and development opportunities to help the company succeed. About 42,000 AT&T mobility employees are represented by the Communications Workers of America (CWA).

For T-Mobile USA workers who want a voice in their workplace, this acquisition can provide a fresh start with T-Mobile management. CWA and ver.di, the largest union in Germany, have partnered to support T-Mobile USA workers in their efforts to come together. The AFL-CIO will continue to work with CWA, ver.di and the global trade union movement to ensure that T-Mobile USA workers transitioning to AT&T will enjoy better employment security and a management record of full neutrality towards union membership and collective bargaining.

The acquisition also promises sorely needed increased broadband speed and build-out in the U.S., particularly rural communities, areas that have been highlighted by President Obama and the Federal Communications Commission as important to bring the U.S. to global parity. In Germany, the deal will allow for greater investment in parent Deutsche Telekom's own fiber network.

Contact: Jennifer Angarita (202) 637-5018

MEET THE AFL-CIO OFFICERS



Richard L. Trumka,
AFL-CIO President
See media kit.
 Facebook



Liz Shuler, AFL-CIO
Secretary-Treasurer
See media kit.
 Facebook



Arlene Holt Baker,
AFL-CIO Executive Vice
President
See media kit.
 Facebook

EXECUTIVE PAYWATCH

Compare your pay with the CEO's.

FACTS & STATS

Find the most up-to-date data available on working family issues.

Category

State

Need Help for College?
Union Plus Education Services
 Go

 YOU ARE UNION
YOU ARE SPORTSMAN
YOU BELONG.
JOIN US!

 UNION RESEARCH
SUMMER SCHOOL
June 12-17, 2011

The UNION BootPro
WORK BOOTS
The highest quality training boot

New Online Degree Programs
NLC NATIONAL LABOR COLLEGE
 LEARN MORE

- Home
- About
- News
- Legislation
- Get Involved
- Events
- Blog
- ADE News**
- Press Releases
- Articles of Interest

Media

Welcome from ADE
Julius Hol

ADE News

« Back to News

ADE EXPRESSES SUPPORT FOR T MOBILE USA AND AT&T MERGER

Posted Mar 22, 2011

ALLIANCE FOR DIGITAL EQUALITY EXPRESSES SUPPORT FOR T MOBILE USA AND AT&T MERGER Organization says merger allows for greater access to affordable broadband and will be key development in efforts to achieve the president's goal of 100% broadband

Media Contact: Cynthia Miller, ADE Marketing Officer at cmiller@adeql.org

ATLANTA, GEORGIA, Monday, March 22, 2011 – Shirley Franklin senior advisor for the Alliance for Digital Equality (ADE) and former mayor of Atlanta, issued the following statement today regarding the planned **acquisition of T-Mobile USA by AT&T**:



"Almost one year to the day after the release of the National Broadband Plan, we are able to take a considerable step forward in our efforts to make affordable broadband available to all Americans. This merger gives us the foundation to achieve President Obama's goal of 100 percent broadband and is a positive step toward providing access to unserved and underserved communities around the country.

"The merger of T-Mobile USA and AT&T is a positive step toward providing greater

Get Invo



The Co

- Al
- Co
- H
- In

Comm

- Br

access to affordable broadband for consumers and employment security and other workforce benefits for the new joint workforce. Additionally, America’s small businesses will benefit from the expansion of business opportunities from AT&T’s steadfast commitment to supplier diversity. We look forward to seeing the benefits of this merger help bring all Americans into the digital age and we applaud our partner, the Communications Workers of America, for their leadership.”

###

About The Alliance for Digital Equality: The Alliance for Digital Equality (ADE), headquartered in Atlanta, GA, is a nonprofit, nonpartisan consumer advocacy organization that serves to facilitate and ensure equal access to technology in underserved communities. The ADE also serves as a bridge between policymakers and minority individuals in order to help the public understand how legislative and regulatory policies regarding new technologies can impact and empower their daily lives.

ADE’s partner Communications Workers of America (CWA) full statement can be read below.

[Click Here to Read the Article](#)

Share This:



Comments

[Post A Comment](#)

Be the First to Leave a Comment. [Click here.](#)

- Lc
 - M
 - Vi
 - At
- Corpo
- Bc
 - Cr
 - Rr
 - Al

<p>About</p> <ul style="list-style-type: none"> About ADE Leadership Coalition Members Learning Without Walls Digital Empowerment Councils 	<p>News</p> <ul style="list-style-type: none"> En Espanol ADE News Press Releases Articles of Interest 	<p>Legislation</p> <ul style="list-style-type: none"> Legislation 	<p>Get Involved</p> <ul style="list-style-type: none"> People The Community Community Leaders Corporations Newsletter Become a Member RSS Feeds 	<p>Events</p> <ul style="list-style-type: none"> Events 	<p>Blog</p> <ul style="list-style-type: none"> Blog Blog History 	<p>Media</p> <ul style="list-style-type: none"> Media Photo Video Radios
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------	------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------

Index of Statements Referenced in the Joint Opposition

100 Black Men of America, Inc.

- Benefits the African American community by creating jobs

ADTRAN

- Benefits consumers by increasing access

AFL-CIO, Richard Trumka, President

- Benefits the American economy, consumers and workforce

Alliance for Digital Equality

- Benefits minority groups, workforce and consumers

Amdocs (see ADTRAN)

- Benefits consumers by increasing access

American Association for People with Disabilities

- Benefits persons with disabilities

American Federation of Teachers, Randi Weingarten, President

- Creates educational opportunities

American Foundation for the Blind

- Benefits persons with disabilities

The Arkansas Attorney General, Dustin McDaniel

- Benefits rural communities
- Promotes public health and safety

Asian & Pacific Islander American Health Forum

- Benefits Asian American, Native Hawaiians and Pacific Islander communities
- Benefit tele-health services

Asplundh Tree Expert Co., George Gunther, CIO

- Benefits customers

Association for Competitive Technology

- Good for innovation

Avaya (also a signatory to ADTRAN)

- Benefits consumers by increasing access
- Benefits consumers by promoting innovation

The Baltimore Chamber of Commerce

- Benefit business and consumers

Brocade (see Avaya)

- Benefits consumers by promoting innovation

Cameron International

- Benefits business

Charles River Ventures

- Promotes innovation and job creation

The City of Placerville Police Department

- Promote public health and safety

Coalition of Labor Union Women, Karen J. See , President

- Benefits the American workforce

Columbia Urban League

- Benefits African Americans

Communications Workers of America, Larry Cohen, President

- Benefits the American workforce

Community Health Works, Gregory Dent, President and CEO, Macon, Georgia

- Promote access to quality healthcare

Congressman Heath Shuler, State of North Carolina

- Increase broadband access

Consumer Awareness Project

- Benefit consumers

Corning, Timothy Regan, Senior Vice President

- Improve spectrum and increase broadband access

Cuban American National Council

- Benefits minority communities

Dominican American National Foundation

- Benefits Dominican Americans

Economic Policy Institute

- Promotes job creation

-

Facebook (see Avaya)

- Benefits consumers by promoting innovation

Future 500, William K. Shireman, President and CEO

- Benefits the environment

General Dynamics Wireless Services (See ADTRAN)

- Benefits consumers by increasing access

Governor Mike Beebe, State of Arkansas

- Benefits rural communities
- Benefits local and national economies

Governor Steven L. Beshear, Commonwealth of Kentucky

- Promotes strong business environment

Governor Terry E. Branstad, State of Iowa

- Benefits rural communities

Governor Nathan Deal, State of Georgia

- Benefit all citizens by expanding access to broadband

Governor Mary Fallin, State of Oklahoma

- Promotes economic growth

Governor Nikki Haley, State of South Carolina

- Expands access to broadband

Governor Bill Haslam, State of Tennessee

- Promotes economic growth, job creation and benefits the educational systems

Governor John W. Hickenlooper, State of Colorado

- Benefit all citizens by expanding broadband access

Governor Bobby Jindal, State of Louisiana

- Promotes economic growth

Governor Paul LePage, State of Maine

- Benefit rural communities

Governor C.L. "Butch" Otter, State of Idaho

- Promotes economic vitality

Governor Beverly Eves Perdue, State of North Carolina

- Creates economic and educational opportunities

Governor Rick Perry, State of Texas

- Benefits rural communities

Governor Brian Sandoval, State of Nevada

- Benefits rural communities

Governor Rick Snyder, State of Michigan

- Benefits business and consumers

The Grand Rapids Area Chamber of Commerce

- Benefit small business and promote job growth

The Hispanic Institute

- Benefits the Hispanic community

The Hispanic Leadership Fund, Mario H. Lopez

- Benefits Hispanics

The Hispanic Technology & Telecommunications Partnership

- Benefits Americans of Hispanic decent

The Institute for e-Health Policy

- Benefits rural and underserved communities
- Facilitates provision of health-care related services.

International Union of Painters and Allied Trades

- Promotes economic growth and job stimulation

International Brotherhood of Teamsters

- Benefits American workforce
- Modernize network infrastructure

Intertribal Agricultural Council, Ross Racine, Executive Director

- Benefit to Native American tribes and communitites

JDS Uniphase Coporation (See ADTRAN)

- Benefits consumers by increasing access

Jobs for New England NOW

- Benefit the economic climate

Juniper Networks, Mitchell L. Gaynor, Executive Director

- Benefits businesses and consumers

The Kern County Fire Fighters

- Promotes public health and safety

Kleiner Perkins Caufield & Byers

- Promotes economic growth

The Latino Coalition, Hector Barreto, Chairman

- Benefits Americans of Hispanic heritage

Lightspeed Ventures (see Charles River Ventures)

- Promotes innovation and job creation

The Lincoln California Police Department

- Promotes public health and safety

Manhattan (NY) Chamber of Commerce

- Promotes jobs and economic development

Matrix (see Charles River Ventures)

- Promotes innovation and job creation

Mayor Shari Buck, City of North Las Vegas

- Benefits the economy by creating jobs

Mayor Kasim Reed, City of Atlanta, GA

- Promotes innovation and job creation

Microsoft (see Avaya)

- Benefits consumers by promoting innovation

Minority Media and Telecommunications Council

- Benefits minorities

Missouri Chamber of Commerce

- Promotes economic growth

NAACP, Hillary O. Shelton, Director of Washington Bureau and Senior Vice President

- Benefits African Americans

National Action Network

- Benefits minorities by expanding broadband access

National Association for Equal Opportunity in Higher Education, Lezli Baskerville, President and CEO

- Improve access to educational resources

National Association of Black County Officials (See National Coalition of Black Civic Participation)

- Benefits African American Communities

National Association of Neighborhoods, Ricardo Byrd, Executive Director

- Promotes economic growth

National Black Chamber of Commerce

- Promotes Broadband access to underserved community

National Black Farmers Association, John W. Boyd Jr., President

- Benefits small farms
- Benefits African American Communities

The National Coalition on Black Civic Participation

- Benefits African American communities

The National Conference of Black Mayors (See National Coalition of Black Civic Participation)

- Benefits African American communities

National Disability Institute

- Benefits individuals with disabilities

The National Grange, Ed Luttrell, President

- Benefits rural communities

National Newspaper Publishers Association, Danny J. Blakewell, Sr. Chairman

- Benefit rural and minority communities by increasing broadband access

The National Organization of Black Elected Legislative Women (See National Coalition on Black Civic Participation)

- Benefits African American Communities

National Rural Health Association, Alan Morgan, CEO

- Increase access to quality healthcare in rural communities

National Spinal Injury Association/United Spinal Association

- Benefits persons with spinal cord injuries

New Jersey Chamber of Commerce

- Promotes business development and innovation

New Venture Partners (See Charles River Ventures)

- Promotes innovation and job creation

North Dakota Chamber of Commerce

- Good for economic development and job creation

Norwest Venture Partners (See Charles River Ventures)

- Promotes innovation and job creation

Oracle (see Avaya)

- Benefits consumers by promoting innovation

Pantech Wireless, Inc.

- Benefits consumers by increasing access

Pride@ Work

- Benefits LGBT communities

Professional Firefighters of New Hampshire

- Promotes public health and safety

Project Amiga

- Benefits Latinos

Qualcomm (see Avaya)

- Benefits consumers by promoting innovation

Radar Partners (See Charles River Ventures)

- Promotes innovation and job creation

Research In Motion (see Avaya)

- Benefits consumers by promoting innovation

The Sacramento Fire Department

- Promotes public health and safety

San Francisco Chamber of Commerce

- Promotes greater productivity and innovation

Sequoia Capital

- Promotes economic growth

Service Employees International Union

- Benefits workforce

Sierra Club, Michael Brune, Executive Director

- Benefits the environment

Sierra Wireless Inc. (See ADTRAN)

- Benefits consumers by increasing access

Silicon Valley Leadership Group, Carl Gaurdino, President and CEO

- Promotes economic growth

TechNet

- Promotes business development, job creation
- Support deployment of LTE network

Tellabs Operations Inc. (see ADTRAN)

- Benefits consumers by increasing access

Technology Association of Georgia, Tino J. Mantella, President

- Promotes business development and innovation

Technology Crossover Ventures (See Charles River Ventures)

- Promotes innovation and job creation

United Food and Commercial Workers International Union, Joe Hansen, President

- Benefits workforce, consumers and promotes economic growth

United Mine Workers of America

- Benefits rural communities and industry in remote areas

United States Cattlemen's Association

- Benefits rural communities

United States Distance Learning Association, John G. Flores, Ph.D., Executive Director

- Promotes access to educational resources

Urban League of Greater Cleveland

- Benefits minorities and low-income Americans in urban communities

Urban League of Greater New Orleans

- Promotes economic growth and benefits access to educational resources

Urban League of Columbia

- Benefits African American community

Urban League of Metropolitan Denver

- Benefits minorities and low-income Americans in urban communities

Urban League of Metropolitan St. Louis

- Benefits minorities and low-income Americans in urban communities

Urban League of Portland, Oregon

- Benefits minorities and low-income Americans in urban communities

Urban League of San Diego

- Benefit the unserved and underserved

West Sacramento Police Department

- Promotes public health and safety

West Virginia Farm Bureau, Charles Wilfong

- Benefits rural communities, local farmers industry and job stimulation

Women Impacting Public Policy

- Benefits consumers and small businesses

World Institute on Disability

- Benefits the persons with disabilities

Yahoo! (See Avaya)

- Benefits consumers by promoting innovation

Merger Makes Consumers Big Winners in LTE Investments

Posted by **Zack Christenson**

March 21, 2011

AT&T's merger with T-Mobile has lit up the blogosphere and tech commentators with some voicing **concerns over competition** but others noting the big benefit of spreading 4G services to millions more Americans. On balance, I think this transaction will be positive for consumers. This merger will leave three large national players and several significant facilities-based regional carriers in the wireless market—more than can be said of many tech industries, including desktop operating systems, search, office applications, or mobile operating systems. There are also more than **180 regional wireless** providers that serve rural, urban, and suburban areas across the country. These competitors leave many options for the average consumer, which keep prices down and help to drive innovation in the market. Just last July, the Government Accountability Office **released a report** which said that consumers benefit from significantly lower rates, by more than 50%, than they did in 1999. We will all want to keep our eye on prices, of course, but I expect the downtrend to continue.

Seth Cooper at the **Free State Foundation** in referencing both the GAO report referenced above, and the FCC's recent Wireless Competition Report, **said** that both reports recount positive trends in wireless innovation and competition, resulting in a wider variety of consumer choice and decreasing prices.

Also, someone needs to explain how exactly a large company like Sprint, which has vast resources and 50 million subscribers, is a loser in this deal. Sprint is still a major player, and has the resources to compete with AT&T and Verizon. In fact, if the furor on the tech blogs is any indication, Sprint has just gained thousands of disgruntled bloggers as customers. But more seriously, Sprint is now poised to be the alternative carrier that many saw in T-Mobile, and can use this opportunity to increase its market share.

The real winner in this merger is the consumer. When I first heard about the merger on Twitter yesterday afternoon, my first reaction was that 4G service was going to be even better and that more people would be able to enjoy it. With the increased spectrum and coverage made possible, both AT&T's and T-Mobile's customers should have a more robust wireless experience.

T-Mobile customers especially stand to benefit. Deutsche Telekom, T-Mobile's current owner, wasn't investing in 4G LTE. The company was toying with different ideas, but had **no clear path** to providing customers with 4G. Without that investment, it's debatable whether T-Mobile had a chance to compete with AT&T or Verizon, and might not have been a viable company into the future. With the commitment from AT&T to invest in 4G, T-Mobile customers will now reap the benefits of a faster and much larger network.

Bottom line: Increased quality and better service means the consumer wins.

Zack Christenson is a Chicago-based digital strategist who writes on tech policy.

The Journal of the American Enterprise Institute

THE ENTERPRISEBLOG



Wake of the Exaflood

By Nick Schulz

March 21, 2011, 10:38 am

The announcement that AT&T (T) plans to purchase T-Mobile USA from Deutsche Telekom (DTE) for \$39 billion is interesting on several fronts. It's clearly an effort by investors to work through the spectrum crunch that has made it a challenge for wireless carriers to meet the rapidly rising demand for mobile broadband services. AT&T helped kickstart that demand rush with partner Apple and the iPhone. Now the success of tablet computer offerings is accelerating what my friend Bret Swanson has dubbed the Exaflood. This purchase is an effort to stay a few steps ahead of that demand.

Expect critics to complain about industry consolidation. That's predictable, but it misses the target. As I've pointed out before, the wireless sector is highly competitive at the moment. This deal won't change that. Consumers would be best served if this deal helps policy makers focus on the most important long-term issue, namely, reforming spectrum allocation so highest-value applications may be realized over time.



Hypothetical Doomsday Declarations Don't Justify Merger Regulations

Friday, April 8, 2011 4:22 PM

0    

When AT&T and T-Mobile announced their \$39 billion merger late last month, it didn't take long for knee-jerk opposition from media reform groups. They declared it "unthinkable," claiming it would bring "less competition" to the mobile market. But there are many reasons to show the merger could actually benefit consumers and incent competition.

First, the AT&T/T-Mobile merger makes technological sense. Both companies utilize the same broadband technologies and will be able to easily integrate their networks. By pooling the two companies' spectrum, cell towers, and other infrastructure, consumers will likely benefit from better coverage and reception – both in rural areas where build-out is lower and in urban areas where broadband demand often exceeds capacity.

This is where declarations that there will be less competition are laughable. Competition for radical media reform groups means the pure number of market players. It's a position rooted in hatred of fewer or larger private enterprises, not one that reflects how competition actually plays out in the market or impacts services. For example, using T-Mobile's HSPA+ broadband technology, AT&T would be able to enhance current 3G services. At the same time, it frees up resources to allow a merged company to speed up deployment of future 4G LTE infrastructure. This creates better competition for wireless broadband speeds with Verizon, who is currently the largest carrier and is well into their LTE launch. And all of this benefits consumers.

Media groups have also claimed it will raise prices. This ignores the fact that the fact that wireless prices have dropped by 50 percent over the past decade and there is nothing to show this would change that trend. It also ignores that mergers can bring better economies of scale and efficiencies that free up resources to either improve service or lower prices.

Nevertheless, look for the perpetually incorrect doomsday predictors at Free Press, Public Knowledge, and Media Access Project to use their dire projections to demand regulations completely unrelated to the acquisition. They cloak their regulatory preferences in establishing "consumer protections," without knowing or justifying whether any harm to consumers will result.

Government rules only incapacitate companies from adequately responding to consumer demand. Placing extraneous conditions on mergers forces companies to forgo providing services consumers want by limiting what companies may do or mandating that they spend finite resources on projects that regulation-hungry groups demand. It also puts the regulated company at a disadvantage with its competitors that are not.

Only the free-market is truly pro-consumer, as business decisions are driven by appeasing customers, and not government bureaucrats or special interest groups with regulatory demands. As Grover Norquist, president of Americans for Tax Reform said, "Companies know better than government what consumers' wants and needs are. Lobbying regulations into a merger for political gain only restricts companies from offering what their customers demand."

No one is 100% certain what the AT&T/T-Mobile merger will bring. But there is no excuse for exploiting this uncertainty by pushing hypothetical doomsday scenarios in the name of greater regulation.



May 9, 2011

The Honorable Patrick J. Leahy
United States Senate
433 Russell Senate Office Building
Washington, DC 20510

The Honorable Charles E. Grassley
United States Senate
135 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Leahy and Ranking Member Grassley:

Across the country, more and more Americans are becoming smartphone users, downloading apps for entertainment, banking, health, and more. Despite the impressive amount of devices and apps available, we have only begun to scratch the surface of growth in the mobile applications marketplace. The iPhone and iPad created entire new markets for developers to write programs. The apps marketplace is a \$5.6 billion industry today, and with the introduction of Windows and Android devices it is expected to grow to \$38 billion by 2015.

Our members at Association for Competitive Technology (ACT)—comprised of more than 3,000 small and mid-size information technology firms—know that this growth calls for more wireless spectrum to allow developers to reach as many customers as possible. The AT&T/T-Mobile merger will fill in the gaps of AT&T's phone network, allowing customers in both rural and densely populated areas to receive high quality service, creating efficiencies that will allow for the deployment of advanced 4G LTE technology to more than 97% of the American population. Furthermore, the merger will allow T-Mobile customers access to new products and services available at LTE speeds.

With more customers holding LTE technology in their hands, application developers will be able to deliver better, and more, products to market. Higher speeds and the more efficient use of the companies' existing spectrum will allow developers to create the same type of programs for mobile devices that users are accustomed to working with on their desktops—bringing wired broadband speeds and capabilities to users on the go.

For the members of ACT, and for all applications developers, this merger will expand the marketplace and provide more opportunity for growth.

As the Committee considers the AT&T/T-Mobile merger, we hope you will take into account how this merger may positively impact our growing mobile apps ecosystem, providing the opportunity for more small and mid-size information technology firms to flourish with higher connection speeds and access to more customers on every smartphone platform.

Sincerely,

Morgan Reed
Executive Director

Association for Competitive Technology

CC: Senator Herb Kohl
Senator Dianne Feinstein
Senator Charles E. Schumer
Senator Richard J. Durbin
Senator Sheldon Whitehouse
Senator Amy Klobuchar
Senator Al Franken
Senator Chris Coons
Senator Richard Blumenthal

Senator Orrin G. Hatch
Senator Jon Kyl
Senator Jeff Sessions
Senator Lindsey Graham
Senator John Cornyn
Senator Mike Lee
Senator Tom Coburn

Bits on Broadband : with Fred Campbell

AT&T/T-Mobile Transaction Best for Mobile Wireless Broadband

Updated on March 20th, 2011

AT&T and Deutsche Telekom announced today that AT&T will acquire T-Mobile from Deutsche Telekom. Rumors have been floated for some time that Deutsche Telekom was looking to sell T-Mobile. AT&T is the most logical choice.

T-Mobile's biggest challenge has been the deployment of a 4G LTE network. AT&T's biggest challenge has been meeting the growing demand for data. The two companies together solve both challenges. AT&T will deploy 4G LTE to 95% of Americans and improve the performance of its data network. This will improve the customer experience and go a long way toward meeting the Broadband Plan's goal of "lead[ing] the world in mobile innovation, with the fastest and most extensive wireless networks of any nation." Faster wireless broadband speeds and better coverage are exactly what the President and the FCC have been trying to achieve, and this transaction promises to provide both.

Compared to past mergers, this one should be relatively seamless. AT&T and T-Mobile both use the same network technology, which should ease the transition. Their spectrum holdings are complimentary, and the companies and employees are both behind the deal. The Communications Workers of American have already expressed their support. AT&T is union company and will invest another \$8 billion in its U.S. infrastructure due to the transaction.

The deal is has already been opposed as well. Public Knowledge says this is why we need strong net neutrality rules and wholesale requirements. But the FCC has already done net neutrality and has circulated an item proposing mandatory data wholesaling requirements for mobile wireless providers. From a competition standpoint, there will still be four or more mobile wireless providers post-merger in major markets, with Light Reading promising to add yet another player.

On balance, I think the FCC approves the deal. I think it will be hard for the FCC to turn down faster mobile broadband and 95% LTE coverage. At the end of the day, the benefits outweigh the potential harms.

Bits on Broadband : with Fred Campbell

Hal Singer's Blog Post on T-Mobile's Ability to Discipline Prices

Updated on March 22nd, 2011

One of the most thoughtful pieces I've seen about the AT&T/T-Mobile deal is this post by Hal Singer posted in the Harvard Business Review. He lays out some good reasons why the merger would not result in higher prices for wireless consumers. I won't try to lay them out here, but I will add one. Assuming T-Mobile disciplines prices now, its ability to discipline prices in the mobile market is likely to decline if regulators don't grant the transaction. The reason: Verizon Wireless, Sprint and AT&T are all converting their networks to LTE, the mobile broadband technology that is poised to become the world standard, and T-Mobile isn't. T-Mobile doesn't appear to have any plans to move to LTE any time soon, and there is no evidence that Deutsche Telekom has any interest in investing the substantial capital necessary to upgrade T-Mobile's network to LTE.

Without LTE, T-Mobile's ability to compete would slowly diminish. Its customers would have an incentive to move to other providers who offer LTE, and T-Mobile's costs would likely increase based on its use of an obsolete or nonstandard technology. (Obsolete if T-Mobile sticks with HSPA+ or nonstandard if T-Mobile were able to persuade vendors to support a more advanced version of HSPA+). With higher costs and technologically inferior service, it's hard to see how T-Mobile would be able to discipline prices if the deal isn't approved.

Forbes

Search news, business



Gallery: The World's Top 25 Companies



10 Most Depressing Jobs



Apply For Our List Of Most Promising Cos.

days ago

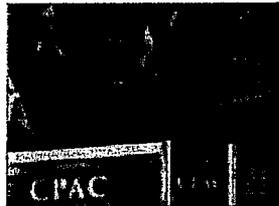
California Steps Up Efforts to Tax Online Sales

KELLY PHILLIPS ERB *Taxgirl*

2 days ago

Groupon IPO: Bad Lov

QUENTIN HARDY *At Your Servers*



Wayne Crews

THE 10,000 COMMANDMENTS

[MY PROFILE](#)

[MY HEADLINE GRABS](#)

[MY RSS FEED](#)

Antitrust In the Airwaves?

Mar. 28 2011 - 1:05 pm | 616 views | 0 recommendations | 0 comments

For a moment there I was thrilled that AT&T and T-Mobile were merging, thinking how great it'll be to finally get reception this coming Easter at my family tobacco farm down in Cody, Virginia.

OK, fine, so it can't happen in only a week or two.

Whatever my anticipation, others' knives came out fast. The group Public Knowledge called the merger "unthinkable" because the 2nd and 4th largest carriers combined would "control" (note that word choice) 44 percent of the wireless market (other's say it'd be 39 percent); and wants us all to tell Obama to halt the transaction. You read that right. Obama—the *president!*—should prohibit a normal business transaction under shareholder capitalism. Even if Public Knowledge is right about market share, the merged entities would *not* control 66 percent of the market, others still would; moreover markets will evolve in response to the merger.

Alas, this is a voluntary business transaction; therefore it's routine, not an aberration, for Washington to delay it. *The Economist* wants the merger stopped, too, equating the telecommunications industry's collapse into the exclusive franchises of a century ago (which made it illegal to compete with incumbents) with the phenomenon at hand today, the very expansion of the realm and reality of communications technologies as such.

We've called this political process of micromanaging large-scale free enterprise by the name "antitrust" for these past 121 years. Of course the process isn't *anti-trust* at all, when what it actually does is overtly enable coziness between government and certain opposed business entities. Antitrust, you'll recall, is the same smokestack era doctrine under which it's a crime for your prices to be higher, lower or the same as anybody else's. And of course, no *business* on its own wields the raw compulsion that Public Knowledge wants to see a politician unleash.

Antitrust often derails free enterprise at the behest of a target's competitors, when, in reality, shareholders, business partners and the capital markets via hedge funds and value investors are well equipped to punish misbehavior or over-reach; that's precisely what competitive enterprise and stock exchanges are for, as well as such mechanisms as shorting stock when managers make bad business decisions. Similarly, as John Tamny pointed out on Forbes.com, there are very good reasons why, if AT&T and T-Mobile sought to jack up prices in a disadvantageous

way, they would not have secured the financing for this deal. Competitive markets are precisely *for* such discipline.

Unfortunately the AT&T and T-Mobile train-ride for the next year-plus is just one of many ongoing interventions that collectively do untold damage to wealth creation in America. These companies aren't alone in the antitrust crosshairs. For example, Apple's Steve Jobs is being required to answer to lawyers because Apple doesn't go out of its way to make life easy for online music competitor RealNetworks. Google's antitrust woes are only beginning, with a FairSearch coalition arrayed against its acquisition of ITA Software and probably most anything new it tries to do. Fifteen years after a 40-year case against IBM finally ended, it's been back under investigation again in the U.S. and overseas—still over mainframes and the software running them. Comcast and NBC are merging, but that took nearly two years.

Perversely, speaking of undermining the market's discipline of firms, Apple's "discipline" of Google was investigated when it was accused of limiting Google ads being served on its devices. Whichever was the good guy or the "bad" guy, they're both big boys and can work such things out.

So, bottom line, thanks to the regulatory mindset, the AT&T and T-Mobile merger faces "antitrust barriers" and a "steep climb at the FCC; and even if they merge the government likely will require large compulsory divestitures.

OK. But we still don't have any AT&T reception down in Cody, VA (that's midway between Brookneal and Gretna on Rt. 40, y'all). To me, the "barrier" of note is the one to getting reception in Southside. Rural availability was supposed to have been one of Obama's goals too.

Complaints about horizontal mergers with competitors as opposed to companies at other vertical levels traditionally face more scrutiny. The merger is \$39 billion; Opponents are right that it's big.

But then again, it's not so big. Of the top 25 global firms by market capitalization, the smallest is \$168 billion Wells Fargo (as of March 28). AT&T happens to be number 23. The deal is just over half the size of the 100th largest company (United Parcel Service). These rankings shift

every day. And just as a practical matter, considering that alongside

consumers all of corporate America depends on mobile communications, these guys better behave themselves.

Mergers flop sometimes (think AOL-TimeWarner. But combinations may be necessary to establish a platform from which to launch new output or lines of business (or to make my phone work in Southside). Current merger guidelines do take dynamic efficiency effects into account, particularly when those effects cannot be achieved except by merging. But as the late economist Murray Rothbard noted, talk of mergers "substantially lessening competition" is meaningless; competition is a process, not a quantity, as he put it.

The two firms' CEOs respectively made assurances to lawmakers, but despite the skepticism (or opportunism) by politicians and bureaucrats about competitive enterprise, prices, service quality and such, these factors and decisions about them are normal offerings that a concerned public expects; a merged entity ignores them at its peril. The CEO's have offered to divest assets; in my view that sort of ransom is appalling. Too often antitrust is about dismantling what others have created or hope to create, undermining large scale voluntarism and enterprise, and replacing it with even larger scale compulsion or prohibition. And speaking of conditions and ricochet effects, count on this merger leading to more calls for wireless net neutrality.

The real harm of antitrust regulation is a general one: any intervention that relieves AT&T and T-Mobile competitors of the driving need to respond to any potentially new superior service or slate of services, hurts the interests of consumers. (such as rumors of a Sprint/LightSquared partnership).

Consumers' interests are also hurt by intervention's impact on the future. Economist Bruce Owen has noted that while merger reviews focus on the transaction at hand, the greater effect may be the signals the investigation sends about how authorities will view future transactions.

Antitrust proceedings and delays—and before this one, those of Echostar/DirecTV, Sirius/XM and others—can harm consumer interests and the communications marketplace. There is too much tolerance of Federal Trade Commission, Justice Department and Federal Communications Commission interference in today's communications-saturated world, and too much tolerance of competitors who properly should have no say in whether or not a rival's merger goes forward. If they really thought prices would rise, they'd applaud (since they could raise their own). So they have to be thinking something else.

The result of all this is that we are increasingly surrounded by a corporate world that is distorted; one that does not resemble and is less competitive than what free enterprise would have actually implemented, a "free" market twisted in a direction it never would have taken, one in defiance of shareholder capitalism and actual market pressures.

To those rivals that might feel satisfaction at the barriers and future conditions put on this merger if it's even "approved" (a term

<http://blogs.forbes.com/waynecrews/2011/03/28/antitrust-in-the-airwaves/>

inappropriate to free enterprise): Political disapproval of this merger makes it easier to put others in the crosshairs next time.

Recommend



Buzz Up!



StumbleUpon



Facebook



Email this

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>

AT&T's Exaflood Acquisition Good for Mobile Consumers, Internet Growth

Mar. 22 2011 - 4:01 pm | 1,297 views | 0 recommendations | 32 [comments](#)
By BRET SWANSON



at&t

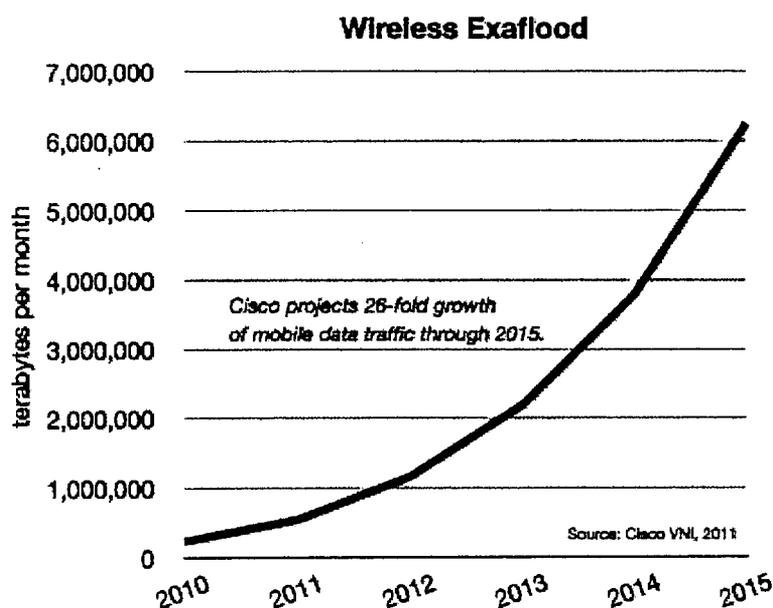
• • T • • Mobile •

AT&T's announced purchase of T-Mobile is an exaflood acquisition — a response to the overwhelming proliferation of mobile computers and multimedia content and thus an onrush of exabytes of network traffic. The iPhone, iPad, and other mobile devices are pushing networks to their limits, and AT&T literally could not build cell sites (and acquire spectrum) fast enough to meet demand for coverage, capacity, and quality. Buying rather than building new capacity improves service *today* (or nearly today) — not years from now. It's a home run for the companies — and for consumers.

We're nearing 300 million mobile subscribers in the U.S., and Strategy Analytics estimates by 2014 we'll add an additional 60 million connected devices like tablets, kiosks, remote sensors, medical monitors, and cars. All this means more connectivity, more of the time, for more people. Mobile data traffic on AT&T's network rocketed 8,000% in the last four years. Remember that just a decade ago there was essentially no wireless data traffic. It was all voice traffic. A few rudimentary text applications existed, but not much more. By year-end 2010, AT&T was carrying around 12 petabytes per month of mobile traffic alone. The company expects another 8 to 10-fold rise over the next five years, when its mobile traffic could reach 150 petabytes per month. (We projected this type of growth in a series of reports and articles over the last decade.)

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>



In 2010, Cisco projected 26-fold growth of mobile data traffic through 2015.

The two companies' networks, spectrum holdings, and businesses are so complementary that AT&T thinks it can achieve \$40 billion in cost savings. That's more than the \$39-billion deal price. Those huge efficiencies should help keep prices low in a market that already boasts the lowest prices in the world (just \$0.04 per voice minute versus, say, \$0.16 in Europe). But those who focus only on the price of existing products (like voice minutes) and traditional metrics of "competition," like how many national service providers there are, will miss the boat. Pushing voice prices down marginally from already low levels is not the paramount objective. Building fourth generation mobile multimedia networks is. Some wonder whether "consolidation of power could eventually lead to higher prices than consumers would otherwise see." But "otherwise" assumes a future that isn't going to happen. T-Mobile doesn't have the spectrum or financial wherewithal to deploy a full 4G network. So the 4G networks of AT&T, Verizon, and Sprint (in addition to Clearwire and LightSquared) would have been competing against the 3G network of T-Mobile. A 3G network can't compete on price with a 4G network because it can't offer the same product. In many markets, inferior products can act as partial substitutes for more costly superior products. But in the digital world, next gen products are so much better and cheaper than the previous versions that older products quickly get left behind. Could T-Mobile have milked its 3G network serving mostly voice customers at bargain basement prices? Perhaps. But we already have a number of low-cost, bare-bones mobile voice providers.

The merger's boost to cell-site density is hugely important. Yes, we will simultaneously be deploying lots of new Wi-Fi nodes and femtocells (little mobile nodes in offices and homes), which help achieve greater coverage and capacity, but we still need more macrocells. AT&T's acquisition will boost its total number of cell sites by 30%. In major markets like New York, San Francisco, and Chicago, the number of AT&T cell sites will grow by 25%-45%. In many areas, total capacity should double.

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>

It's not easy to build cell sites. You've got to find good locations, get local government approvals, acquire (or lease) the sites, plan the network, build the tower and network base station, connect it to your long-haul network with fiber-optic lines, and of course pay for it. In the last 20 years, the number of U.S. cell sites has grown from 5,000 to more than 250,000, but we still don't have enough.

Spectrum is even more crucial and harder to acquire. Washington is contemplating new sales of up to 500 megahertz (MHz) of underutilized or government-owned spectrum. The goal is to get 300 MHz worth out the door by 2015. But that may be optimistic. Spectrum auctions notoriously lag, and even if the 2015 goal is met, AT&T doesn't have four years to wait. T-Mobile's ownership of a national AWS license at 1.7 GHz, moreover, will allow AT&T to deliver more high-speed data services much sooner.

CEO Randall Stephenson says the T-Mobile purchase will achieve almost immediately a network expansion that would have taken five years through AT&T's existing organic growth plan. Because of the nature of mobile traffic — it's unpredictable, and bandwidth is shared — the combination of the two networks should yield a more-than-linear increase in quality improvements. The increased cell-site density will give traffic planners much more flexibility to deliver high-capacity services than if the two companies operated separately.

The U.S. today has the most competitive mobile market in the world (second, perhaps, only to tiny Hong Kong). So even after the merger, the U.S. will still have a more "competitive" market than most. But "competition" is often not the most — or even a very — important metric in these fast moving markets. In periods of undershoot, where a technology is not good enough to meet demand on quantity or quality, you often need integration to optimize the interfaces and the overall experience, *a la* the hand-in-glove paring of the iPhone's hardware, software, and network. Streaming a video to a tiny piece of plastic in your pocket moving at 60 miles per hour — with thousands of other devices competing for the same bandwidth — is not a commodity service. It's very difficult. It requires millions of things across the network to go just right. These services often take heroic efforts and huge sums of capital just to make the systems work at all. Over time technologies overshoot, markets modularize, and small price differences matter more. As Harvard Business School's Clayton Christensen taught us, products that seem inferior but which are "good enough" then begin to disrupt state-of-the art offerings. This was what happened to the voice minute market over the last 20 years. Voice-over-IP, which initially was just "good enough," made voice into a commodity. Competition played a big part, though Moore's law was the chief driver of falling prices. Now that voice is an inexpensive afterthought (though still not good enough on many mobile links) and data is king, we see the need for more integration to meet the new challenges of the multimedia exaflood. It's a never ending, dynamic cycle.

The merger will have its critics, but it seriously accelerates the coming of fourth generation mobile networks and the spread of broadband across America.

<http://blogs.forbes.com/bretswanson/2011/03/22/atts-exaflood-acquisition-good-for-mobile-consumers-internet-growth/>

<http://blogs.forbes.com/johntamny/2011/03/26/attt-mobile-protests-are-born-of-naive-misunderstanding/>

AT&T/T-Mobile Protests Are Born of Naive Misunderstanding

Mar. 26 2011 - 3:23 pm | 3,729 views | 1 recommendation | 16 [comments](#)

By JOHN TAMNY

The late great political economist [Jude Wanniski](#) used to say that even those most hostile to classical or supply-side theory apply it to their daily, micro lives. Though many in the commercial world to this day question the empirical reality that a relatively low rate of taxation actually yields more taxable revenues, none question this notion as it applies to their own business and the sale of consumer goods.

No doubt some companies would relish the ability to charge nosebleed prices to goose profits, but frequently the surer path to profits is lower prices that drive exponentially more sales on the way to even greater profits. Taxes on the other hand are nothing but a price placed on work, so if taxable revenues are the goal, history says it's better to lower the price placed on work to get more of it, along with more revenues in the bargain.

So while theories of taxation do not define present opposition to [AT&T's](#) proposed purchase of T-Mobile, prices certainly do. As is seemingly the case every time a merger is announced, many members of the economic/business commentariat are predictably chirping about how the combination will be anti-consumer; the thinking here that with a competitor for mobile-phone service swallowed, AT&T will be able to increase prices.

The above is good in theory, but simple logic and historical realities disprove what naïve thinking.

For one, with the commercial outlook nothing if not hazy, there's no certainty that absent T-Mobile's sale that the latter would survive on its own. As [John D. Rockefeller's](#) consolidation of the kerosene/oil industry back in the 19th century reveals, many of the competitors he purchased were lucky that he did so. In head-to-head competition they would have been put out of business, so shares in Standard Oil were quite the tradeoff when measured against failure.

Of course as a serial acquirer, it's assumed by some to this day that with ever growing pricing power, Rockefeller bled hapless consumers lacking Standard competitors to turn to. In reality, and thanks to the efficiencies wrought by consolidation free of anti-trust meddling, Rockefeller continuously reduced prices.

About Rockefeller's seeming generosity, to assume that it was just that would be every bit as naïve as the assumption that a more powerful AT&T would increase prices today. Simply put, high prices and grand profits are what attract competition that invariably lowers both.

Though the growth of the oil industry on a global basis eventually rendered as moot the then popular notion of Rockefeller as a monopolist, his intense focus on ever lower prices was surely rooted in self interest. Once again, high prices are what attract competition eager to capture a portion of the profits gained from those prices.

Looking at AT&T and its planned acquisition, it's fair to suggest that it could not attract the financing necessary to complete the purchase if its plan was to raise prices. Not only would such a move be unrealistic given the existence of Verizon and other smaller competitors, it would also be self-defeating for high prices signaling to those outside the mobile-phone space a potentially profitable competitive opportunity.

But even absent new entrants eager to capture some of AT&T's presumed new pricing power, the suggestion that Ma Bell would raise prices remains unrealistic and is born of naivete in the

<http://blogs.forbes.com/johntamny/2011/03/26/attt-mobile-protests-are-born-of-naive-misunderstanding/>

1

<http://blogs.forbes.com/johntamny/2011/03/26/att-mobile-protests-are-born-of-naive-misunderstanding/>

commentariat as to how businesses grow, and in growing, attract new capital. To put it very simply, any efficiencies and profits gained from an AT&T/T-Mobile combination are already somewhat priced by investors.

Looking ahead, what investors really want to know is what a newly formulated and more profitable AT&T will do beyond selling what is increasingly a low-priced commodity (mobile phone service) to voracious consumers. More specifically, investors want to know how much AT&T will achieve the efficiencies necessary to reduce the cost of mobile service with an eye on capturing the newly available dollars of their customers for other services, including those not yet on offer.

Indeed, while Apple Computer certainly transformed the market for mobile phones, for it to have maintained the extraordinarily unique iPhone's initially high price would not have been a growth strategy. Basically Apple sought production efficiencies to reduce the cost of its phone so that eventually its worshipful customer base would have the means to acquire its other innovations, including the increasingly ubiquitous iPad. The latter is all the rage now, but in time the cost of it will decline and Apple will have yet more innovations ready for a ravenous customer base made relatively flush by falling prices in the core goods it presently sells.

The same applies to AT&T, and if the Department of Justice correctly stays out of the way, a combined AT&T/T-Mobile. Today's cellphone services are yesterday's news, and indeed, that's what the fatal conceit that is anti-trust seeks to regulate: yesterday's news. Lacking hotlines to the future, anti-trust lawyers vainly work to oversee what's already happened, and the act itself exposes the sheer folly of anti-trust.

So rather than block what shareholders in both companies apparently deem necessary, it's time for the anti-trust establishment to reveal its humble side so that AT&T and T-Mobile can merge. After that, the very customer base that decides which companies will grow and which will fail can render a market-based judgment on the good and bad of this combination.

<http://blogs.forbes.com/johntamny/2011/03/26/att-mobile-protests-are-born-of-naive-misunderstanding/>

Tuesday, March 29, 2011

The AT&T and T-Mobile Merger: Thinking Things Through

Remember the 2008 merger of the satellite radio companies, XM and Sirius? The National Association of Broadcasters, advocating on behalf of its terrestrial broadcaster members, adopted a facile battle cry slogan. The NAB said the proposed combination was a "merger to monopoly."

The NAB's claim was specious because "satellite radio" was part of a much broader marketplace comprised of audio information and entertainment service providers using multiple platforms, including free 'over the air' AM and FM radio, iPods, mobile-phone streaming, HD radio, Internet radio and next-generation wireless technologies. The ferocity with which the NAB tried to defeat the merger refuted the notion that its terrestrial broadcaster members did not compete in the same market.

[Tip: When considering competitive and market impacts for purposes of merger reviews, observe the extent to which various *competitors*, often many *competitors*, mount vigorous campaigns designed to convince the antitrust authorities and the regulators that if the merger is approved there will be an absence of *competition*. Note the incongruity.]

I recall the NAB's silly "merger to monopoly" mantra now because, in the face of AT&T's proposed acquisition of T-Mobile, some of the usual "I've never seen a merger I would approve" suspects have been quick to claim that a merger from "four to three" in the wireless marketplace, or at least this particular "four to three" merger, necessarily would be anticompetitive.

But, please, not so quick!

While the "four to three" formulation, like the NAB's "merger to monopoly" mantra, may make a nice sound bite, it is in no way a substitute for the rigorous market analysis and weighing of the public benefits that will determine whether the proposed combination should be approved.

At the time AT&T's acquisition of T-Mobile was announced, I had no hesitancy in stating: "Like all mergers of this size, the proposed AT&T - T-Mobile combination will get close scrutiny, and it should." So I do not propose here to offer a final judgment on the merger – before the merging parties have even filed their supporting papers with the FCC, or provided documentation to the antitrust authorities.

But I do suggest that formulaic sloganeering, coupled with the predictable, tiresome references concerning "giant" corporations, ought to be ignored throughout the review process. This sloganeering does nothing but detract from the type of informed analysis which ought to be performed.

With that in mind, I don't want here to go into any in-depth market analysis, except to note, assuming the AT&T/T-Mobile merger is consummated, that there will still be three major nationwide providers – AT&T, Verizon, and Sprint – along with many smaller providers, such as MetroPCS, Leap Wireless, and U.S. Cellular, which serve many geographic areas. There are reportedly five or more competitors in the top 20 markets. There are other providers as well, such as TracFone, which serve niche product markets by differentiating their offerings on the basis of price or terms of service.

While Sprint asserts that, post-merger AT&T and Verizon, would "control" 72% of the subscribers, the 28% of the market that remains is not marginal. It seems sufficiently large that the remaining competitors would continue to exert competitive discipline on Verizon and AT&T. Of course, and more fundamentally, it is wrong to view the market shares as static, as if the competitors simply accede to characterization of "control" of subscribers and cease competing. If this were true, the Sunday newspapers would be an awful lot smaller than they already are.

As the inquiry into the merger begins, here are some thoughts to keep in mind. The government's role is not to judge the merits of the AT&T/T-Mobile combination against some other hypothesized – or wished for – combination that was never proposed and never might have been. Its job is to assess the merits of the proposal before it.

And it will be most important to keep in mind as well the rapidity with which the parameters of communications and information services market change, driven by the interplay and feedback loops of incessant technological change and evolving consumer demands. In light of such rapid changes and feedbacks, it is difficult for even the most sagacious and experienced business and technology gurus to predict the future course of communications markets, or of shifting market power within those shifting markets.

I mean no disrespect to government workers in suggesting they are even less likely than the business people or technologists to have the knowledge or expertise to succeed at making accurate

predictions concerning the future of these dynamic markets. Indeed, given their dismal past track record, for example, conditioning mergers such as the AOL/Time Warner based on misplaced predictions concerning future market dominance and technological evolution, there is every reason to believe the antitrust authorities and the FCC commissioners and staff should approach the AT&T/T-Mobile merger with a healthy dose of humility concerning their own perspicacity.

Finally, the merger presents the FCC with yet another opportunity to demonstrate some much-needed regulatory modesty in the way the agency handles merger reviews. I first outlined the problems with the FCC's approach to merger review in a piece for *Legal Times* in March 2000 entitled "Any Volunteers?" As the title of the piece suggests, a significant recurring problem is the Commission's unseemly practice of extracting from the merger applicants, late in the review process, so-called "voluntary" commitments in exchange for the agency acting on the merger. Trouble is, these extracted conditions often have little or nothing to do with any specific competitive issues raised by the proposed merger. If the voluntary conditions are suitable at all for adoption as FCC-enforced mandates – and many are not – they should be considered in generic rulemaking proceedings.

For much more on this, see my recent blog, "FCC Merger Review Reform: The Case for Regulatory Modesty," and also FCC Commissioner Meredith Baker's excellent recent address on the subject. While the gist of my advocacy over the years, as well as the thrust of Commissioner Baker's speech, is that the Commission should adopt new generic policies and processes for handling merger reviews outside the context of any particular merger, there is no reason why the agency, in a display of self-restraint, cannot begin the long-overdue reform process right now.

Stranger things have happened.

Technorati Tags: Randolph May, Randolph J. May, AT&T, T-Mobile, FCC Merger Review, Merger Reform

Posted by Randolph J. May at 3:39 PM 

The Foundry

Making the Right Call on AT&T and T-Mobile

No sooner did AT&T announce on Sunday its **proposed acquisition of T-Mobile** than analysts began handicapping whether federal regulators will approve the deal.

The \$39 billion fusion of the second- and fourth-largest providers of U.S. wireless service (by revenue) is sure to trigger lots of hand-wringing at the Federal Communications Commission (FCC). But the agency's penchant for regulatory excess has harmed consumers in the past, and Congress ought to constrain it from doing so in this case.

Under current law, the commission must approve all transfers of radio spectrum licenses and telecommunications operating certificates. Consequently, it does have a regulatory role in mergers and acquisitions. But commissioners and their staffs have routinely abused their regulatory discretion by exploiting license reviews to promote pet causes. And while license transfers are rarely rejected outright, the FCC frequently imposes onerous conditions, including divestiture, service restrictions, and mandates.

As it is, the proposed acquisition will be thoroughly reviewed by antitrust authorities at either the Federal Trade Commission or the U.S. Justice Department. A tortuous investigation by the FCC would thus be redundant and unwarranted.

AT&T officials obviously anticipate a fight; they are predicting that the regulatory juggernaut will extend some 12 months. But a year can be an eternity in the telecommunications market, in which innovation continuously transforms competitive dynamics.

They also expect that AT&T will be required to divest "substantial" parts of its wireless subscriber base to appease regulators. But to the extent that approval requires the surrender of assets, the company will have that much less to invest in upgrading and expanding its network.

The principal issue is whether the T-Mobile purchase will undermine competition. That has certainly not been the case with major telecom mergers in the past decade. Indeed, the overall average price for wireless services (adjusted for inflation) declined by a whopping 50 percent between 1999 and 2009, a period in which five wireless mergers took place.

The vast majority of American consumers enjoy multiple choices among wireless services. It is particularly important that antitrust officials undertake a "granular" evaluation of regional markets—rather than simply totaling up numbers nationwide—to gauge the true extent of competition. The competitive landscape can differ dramatically among various regions.

The government's review should also recognize the potential benefits of the merger rather than fixate only on the "big is bad" doctrine. The merger can be expected to produce broadband efficiencies at a time when spectrum is in very short supply. Broadband applications have exploded, of course, as has spectrum-hogging video. But FCC mismanagement is also a major factor—proof positive that the agency is hardly qualified to micromanage the industry.

Having long exercised considerable power—albeit unauthorized—over mergers and acquisitions, the FCC isn't likely to curb its regulatory impulses on its own. But with regulatory costs at an all-time high, the economy and consumers can hardly



<http://blog.heritage.org/2011/03/22/making-the-right-call-on-att-and-t-mobile/>

afford higher telecom prices courtesy of an overactive FCC. Voters in the last election made it plain that they want governmental restraint. It's long past time that restraint was imposed on the commission.

HIGHTECH forum

Thoughts from the Technology Trenches

Why is it Good to Combine Networks?

March 23rd, 2011 by [Richard Bennett](#) | [1 Comment](#)»

[Note: This post covers the technology side of the proposed AT&T - T-Mobile merger, and only the technology side. To see what I think about the policy side, check out the [Innovation Policy Blog](#) on Monday, March 28th.]

Many of the questions coming up around the AT&T – T-Mobile merger have to do with spectrum. AT&T clearly wants T-Mobile's spectrum and spectrum-related assets such as towers so much that they're willing to outbid the other suitor. But why is it better to have one big network to serve 140 million customers than to have two smaller networks serving 100 million and 40 million customers respectively?

The easiest way to explain this is with a personal anecdote. I've been a customer of both AT&T and T-Mobile recently, and therefore had the opportunity to do some impromptu testing of both networks. I found that talking on the phone while driving from Sunnyvale, CA to the East Bay community where I live would typically result in a call dropping four days out of five. T-Mobile calls would drop on the south side of the Sunol Grade on I-680 more often than not, but nowhere else. AT&T calls did fine at the Sunol Grade, but would drop on the north side of Pigeon Pass on CA-84 more often than not. When you consistently get call drops like these, you're driving through a dead zone where your RF coverage isn't good due to the combination of topography and tower placement; it's no accident that they happen most often on the wrong side of a hill, because hills cast RF shadows just like trees do with sunlight.

If the AT&T and T-Mobile networks were combined, it's not hard to imagine that both of these call drops would be eliminated since the dead zones are both very small relative to the footprints of the relevant towers – neither is in a populated area. The combined network wouldn't have any dead spots on the commute from Silicon Valley and Pleasanton/Livermore.

There are other reasons for call drops, such as over-booked towers and overloaded spectrum, and these would be alleviated in many circumstances as well: If AT&T's tower is overloaded in one area, but T-Mobile's isn't, then load balancing would eliminate the overload. Similarly, if the overload is on the T-Mobile side but not on the AT&T side, joy would also ensue because the same traffic volume would be distributed across a greater pool of spectrum with lower average load. So that's good as well.



INNOVATION POLICY BLOG

Innovation is Not a Partisan Issue

Spectrum: The Capital that Drives Wireless Competition

Wireless competition depends on spectrum: We can only have as much effective mobile broadband competition as have spectrum to support. This fact doesn't get as much attention as it should in the general discourse on network competition or the specific controversy currently raging over the proposed ATT-T-Mobile merger. While Washington is clearly aware of the need for more spectrum, the link to competition has been lacking. The National Broadband Plan called for a massive release of spectrum to enable mobile networking:

Recommendation 5.8: The FCC should make 500 megahertz newly available for broadband use within the next 10 years, of which 300 megahertz between 225 MHz and 3.7 GHz should be made newly available for mobile use within five years.

In the year since the Plan was published, there's been a lot of talk in Washington about this recommendation: Some partial inventories have been released, some candidate bands have been identified, a number of bills have circulated regarding spectrum auctions and additional inventories, but there's been no concrete action to implement the recommendation.

The spectrum crunch is real: Without spectrum, we don't get the benefits of LTE, the next-generation mobile broadband system that speeds up mobile apps and potentially increases broadband competition across the board. The essential element of LTE, after all, is its ability to translate larger chunks of spectrum into faster network interactions, and that depends on having access to lots of radio spectrum in the first place. LTE is not only about efficiency, it's also about faster networks that consume more bandwidth overall to provide a more satisfactory service to a broader range of applications. The candidate spectrum for LTE was firmly in the clutches of local TV broadcasters and government agencies a year ago, and it remains in the same hands today.

Against this background, two of our national mobile network operators have struck a deal for short-term relief from the spectrum crunch, the proposed takeover of T-Mobile by AT&T Wireless. Prior to the 700 MHz auction, AT&T held licenses to 91 MHz in the largest 100 markets (it's up to 110 or so now,) so the acquisition of T-Mobile's 54 MHz would increase their spectrum holdings by roughly 50%, putting them on par with Clearwire but in better frequencies. Here's an oldish slide that tells the tale:

USA Spectrum Holdings – Larger Carriers Better Positioned than Smaller Ones

- Big 4 Wireless Carrier Holdings
 - AT&T – GSM 2G and 3G service deployed in cellular and PCS bands. AWS is unused and in 2010E the 700MHz band will be used for 4G trials with commercial deployments in 2010E.
 - Sprint – iDEN deployed in cellular band and CDMA 2G and 3G in the PCS band. Sprint has unused 2.5 GHz spectrum via its 51% ownership in Clearwire, which is deploying 4G WiMAX in this band.
 - T-Mobile – GSM 2G service deployed in the PCS band. GSM 3G deployed in the AWS band. To move to 4G must secure more spectrum or reform existing spectrum.
 - Verizon – CDMA 2G and 3G in the cellular and PCS bands. Deploying 4G LTE in the 700 band and is expected to cover 100 million people by year-end 2010. AWS band has no announced plans for use.
- Potential Upcoming Auctions
 - 700 MHz D-Block – late 2010 / early 2011? 10 MHz in the 700 MHz band
 - AWS-3 – mid-2010? 25 MHz in 2.1 GHz band

(top 100 markets)	Cellular	PCS	AWS	700	2.5 GHz	Total (MHz)
AT&T	25	34	12	20	0	91
Verizon	25	21	13	32	0	91
T-Mobile	0	27	27	0	0	54
Sprint	17	36	0	0	0	53
Cable Co's	0	0	19	0	0	19
Clearwire	0	0	0	0	150	150

Morgan Stanley

Source: U.S. Cellular and Morgan Stanley Research

It's no secret that Deutsche Telekom had been looking to sell T-Mobile for some time prior to Sunday's bombshell announcement. While most mobile networks are gaining subscribers – especially the small carriers such as MetroPCS and Leap – TMo has been losing them.

While most national carriers are planning for their LTE transitions, spectrum-starved TMo has had to content itself with polishing up its 3G service with higher efficiency and faster HSPA+. TMo was late to the spectrum auction party, and made a poor bet on smartphones, partnering with HTC for the ill-fated G1 instead of going with more solid plays such as a 3G BlackBerry with AWS support and better Android platforms from Samsung, LG, and Motorola, and isn't well positioned in terms of overall spectrum holdings.

Deutsche Telekom is a thoroughly European company that does well in the minimally competitive continental markets dominated by relatively uninspiring Nokia phones and uniform GSM technology. To succeed in the rough-and-

tumble American cellular markets, established networks invest savagely in spectrum auctions and equipment to expand data services, and upstarts such as Clearwire and LightSquared offer different value propositions and technologies than established players. In the U.S., apps and platforms are as important as towers and backhaul are in Europe, and the market moves at Internet speed. Even in England, Europe's most competitive mobile market, DT has chosen to partner with France Telecom in the "Everything Everywhere" joint venture rather than going it alone.

It's been a foregone conclusion that DT was leaving the U.S. market as a stand-alone competitor, and the only question was who they would partner TMo with. Before Sunday, the smart money was on Sprint, but a Sprint-TMo tie-up never made sense due to the incompatibility of the two firms' technologies. Sprint, like Verizon and most American carriers, is a CDMA company, while TMo uses the same GSM/HSPA+ technology that AT&T employs. TMo was also planning an eventual transition to LTE, like AT&T, Verizon and most others, while Sprint is still officially banking on Wi-Max to provide its upgrade path to the future. And while Sprint isn't spectrum-rich in its own right, as the lead partner in Clearwire it has access to ample spectrum; for Sprint, the value proposition in a T-Mobile acquisition was customers rather than spectrum.

Sprint has already undergone merger pains with the incompatible Nextel network it acquired in 2005 and knew well enough to discount its offer for TMo to a level that would include transition costs. AT&T didn't have to discount its offer, and was therefore able to out-bid Sprint for a network that it can more or less immediately use, subject to the vagaries of some of the oddball AWS frequencies in the TMo spectrum portfolio.

The merger highlights the fact that technological analysis and economic analysis of the same phenomenon can often lead to different answers about the good and the bad. The merger of the nation's second and fourth largest networks clearly reduces competition: Instead of a market with four national networks, we now only have three; instead of the market with three equal sized competitors that would have come about from a Sprint-TMo merger, for example, we have two major players with a combined market share of 70%, one minor national player, and a host of small regional operators; and instead of three national LTE networks sometime in the future, we'll now only have two (unless Sprint dramatically changes course and chooses LTE over Wi-Max.)

Approval of an AT&T-T-Mobile merger means that regulators would be bound by consistency to approve a future Verizon-Sprint merger and usher in an official duopoly in mobile networking. A duopoly American cellular market would resemble a continental European market, where the common scenario features

two dominant carriers with a combined 75+ percent share and a small group of upstarts nipping at their heels.

Table 1: Mobile Market Structure in Selected Countries (source: Merrill Lynch Calculation cited on p. 197 of FCC report.)

Country	Nationwide HHI	Number of Competitors	Top 2 Share
USA	2220	4	55.2%
UK	2240	5	50.6%
Germany	2920	4	70.2%
Italy	3020	4	71.7%
Canada	3110	3	67.4%
Australia	3120	4	73.3%
Sweden	3370	4	75.9%
France	3390	3	78.0%
Finland	3490	3	77.0%
Japan	3590	3	77.6%

Duopoly markets must be more heavily regulated than more competitive ones, and government regulators don't make pro-innovation choices nearly as well as technical competitors do; this is why the U.S. has pursued pro-competitive broadband policy goals since the 1996 Telecommunications Act and why we lead the world in innovative mobile devices and applications. But as the National Broadband Plan reminds us, effective competition requires capital, and in the mobile space some of that capital takes the form of spectrum. Network operators are all retailers in a sense, buying capacity (spectrum and backhaul) in bulk and reselling it to individual consumers. To successfully operate an LTE network that enables more people to use more bandwidth, more spectrum licenses are a precondition.

DT's desire to leave the U.S. market suggests that we don't have enough available spectrum to sustain four national 4G networks, the same message the National Broadband Plan delivered. When market behavior reinforces policy predictions like this, it's wise to pay heed. So when are the Washington policy makers who have the power to re-purpose inefficiently used and underused spectrum going to take action?

Enabling the mobile competition policies that worked so well in the 2G voice era to carry over to LTE requires quick and effective action. Make no mistake about it, competition depends on the resources that mobile networks have at their disposal. 150 MHz of spectrum is enough to sustain five or ten national voice networks, but only enough for a single national LTE network; the more

competitors we want, the more spectrum we need. The U. K. has taken this

message to heart, adjusting the results of its LTE spectrum auction to ensure that four networks will emerge from the process with the ability to provide national coverage.

This may seem counter-intuitive, because total spectrum requirements should be dictated more by the total number of users (and what they're doing) than by the number of operators. This is true except for two big qualifiers: Multiple operators can't use the same spectrum as efficiently as a single operator can, because they have to allow for guard bands between their holdings (like the TV White Spaces between broadcast channels do) as well as statistical variations on what they can share via roaming agreements and the like. Operator A can't make a roaming agreement with Operator B that compromises his ability to serve his own customers. And more importantly, the existence of competitive operators stimulates innovation, which gives rise to more consumption. So we don't just tolerate spectrum inefficiency in the name of competition, we actively promote it. Spectrum enables wireless competition, and we will only have as many healthy mobile networks as we have spectrum to power.

Policy makers need to make a grown-up choice: Do they want competition among a good number of healthy, wireless competitors, or do they fear the political clout of the current spectrum occupants so much that they're willing to compromise American competitiveness for the sake of preserving legacy uses such as high-definition over-the-air TV spread out over a wide range of frequencies? This sounds like an easy choice to those of us who don't have to win elections to keep our jobs, but the reality is that broadcasters have more First Amendment power than the rest of us, and they are in fact fully willing and capable of making life very difficult for elected officials unless there's a united front on both sides of the aisle against their spectrum-squatting ways. Likewise, it's time to get government at all levels to stop wasting valuable spectrum on legacy applications that can be relocated and updated to use spectrum more efficiently.

Finally, public policy makers need to carefully consider the effects that the naïve and misguided "net neutrality" fixation has on network competition. MetroPCS, the kind of scrappy, upstart network operator that should be encouraged by lovers of innovation, is the first operator to find itself in the crosshairs of the FCC's Open Internet rules. MetroPCS offers a limited Internet plan that allows users to view YouTube videos but not others without an additional fee.

Neutralists are aghast that anyone would offer access to part of the Internet instead of the whole enchilada, but their objection is more ideological than practical. If people want to buy a "YouTube Plan" instead of a "Whole Internet

Plan,” why shouldn't they be allowed to do so? No good argument has been offered to explain why such partial plans should be disallowed, and those arguments that have been offered sound like pleas for eating broccoli three times a day: “Trust me, it's good for you.” We might very well all be better off on vegetarian diets, but such things are personal choices, not public policy decisions.

Many smart people in Washington seem to think that the approval of the AT&T-T-Mobile merger is a foregone conclusion. They believe regulators will find a way to address the current constraints for spectrum, special access, the ability to shoulder arbitrary net neutrality rules and related issues such as handset licensing, and will approve the deal with necessary conditions. They could be right, but the fact remains that regardless of the outcome of this particular merger review, effective wireless broadband competition depends on the longterm availability of adequate spectrum.

The message couldn't be more clear: A \$39 billion dollar bid for an ailing network whose main value is spectrum is a clarion call to Washington to implement the National Broadband Plan's recommendation to free up 500 MHz for mobile broadband; AT&T's desire to merge with T-Mobile is like buying a car to get a set of tires. The transaction places a value of 750 million dollars per megahertz on T-Mobile's spectrum portfolio. When we translate that figure into the economic gains that come from the actual deployment of 500 MHz into productive use, we're looking a number that's large enough to make a dent in the national debt.

Most importantly, we have to realize that the continuation of America's successful pro-competition and pro-innovation broadband policy requires a much larger pool of spectrum. This proposed merger is telling policy makers that spectrum is not just the oxygen that enables innovation to breathe, it's the capital that drives competition.

March 20, 2011 7:25 PM PDT

AT&T and T-Mobile--listen before you judge

by Larry Downes

The usual suspects are already sharpening their knives against AT&T's announced acquisition of T-Mobile's U.S. business.

Within hours, the Media Access Project announced that "if approved, this deal would further increase costs and decrease choices for the public." Media reform group Free Press headlined its press release, "Consumers lose when there's less competition." And Public Knowledge condemned the deal as "unthinkable."



at&t

That sort of rhetoric is par for the course inside-the-beltway where, for some reason, every combination of business assets is presumed to be hostile to consumers. These groups are so convinced of the evils of mergers that they no longer feel the need for bothersome facts and time-wasting analysis.

But out here in the real world, thinking things through is actually still considered a rational way to analyze a problem.

So let's think about the "unthinkable."

Of course, the details of the planned merger haven't been made public yet, so it's hard to say specifically how the combination will affect consumers, influence market dynamics, or change the landscape for communications services--mobile and otherwise.

But at the same time, I don't understand the line of non-reasoning that opposes any combination of two companies in the same industry on the theory that any loss of competition, no matter how theoretical, translates to higher prices and reduced service to consumers.

For starters, it assumes that the sole purpose of any merger is to gain economic leverage over one's customers and to translate that leverage into consumer harm. That, in any case, isn't what managers tell investors, who like the rest of us don't see what a company would have to gain from intentionally fouling its own nest.

From the standpoint of investors, the whole point of mergers of this kind is to give the merged entity economies of scale and other efficiencies that allow it to operate at a lower unit cost. That is, to make it more competitive.

That's especially important in the wide-open and fast-evolving mobile industry. Assuming the deal is ultimately approved, there will still be significant competitors to AT&T in every U.S. market--competitors who will be eager to take advantage of inevitable distractions for AT&T in both pursuing and implementing the merger.

Companies regularly underestimate the costs and time it takes to complete a merger, by the way, which can also be helpful to competitors. And mergers of this scale may fail to ever deliver the benefits to investors that inspire them, perhaps because technological advances in the interim undermine the assumptions that made the merger seem attractive. Witness America Online and Time-Warner, which similarly and incorrectly terrorized consumer advocates in 2000. (Adam Thierer, now with The Mercatus Center, wrote a brilliant paper in 2009 (PDF) analyzing both the fear-mongering and sober realities of media and communications mergers over the last decade that is well worth rereading.)

More, not less, competition

In opposing mergers without any analysis (which requires thinking, after all), facts pose little obstacle for the true disbelievers. But for those who care about such details, it simply isn't true, as the Media Access Project says in its press release, that "The FCC's National Broadband Plan, issued last year, warned about the absence of sufficient competition in the wireless market." Actually reading the FCC's plan, I find just the opposite. There is no hint of a warning about insufficient wireless competition. According to the FCC, rather, as of last year over 77 percent of U.S. homes had access to three or more providers for 3G mobile services.

In fact, the FCC believes that expanding and accelerating the deployment of next-generation 4G services has the potential to increase competition, not just in mobile but in the broader category of all communications services. As higher-speed and more efficient 4G services are implemented, the FCC notes, LTE services have the "potential to be a closer competitor to wireline broadband" than existing 3G services.

Making 4G available to more U.S. consumers, in other words, is not only good for mobile competition but also makes mobile a viable alternative to wired service, where some consumers currently have fewer options.

And the U.S. Department of Justice, who along with the FCC will need to give approval for the merger, agrees. In its submission to the FCC as part of the development of the FCC plan, the Department of Justice said nothing about a lack of competition in wireless service. Quite the contrary, it found that robust competition was spurring the kind of innovation that was making wireless a viable competitor to wireline. "Emerging fourth generation ('4G') services," the Department wrote, "may well provide an alternative sufficient to lead a significant set of customers to elect a wireless rather than wireline broadband service."

Which is precisely the point of the proposed merger. According to AT&T, "Because of the scale, spectrum and resources resulting from this transaction, AT&T can expand 4G LTE to 95 percent of U.S. population or 294 million people."

By bringing together complementary spectrum from AT&T and T-Mobile, the combined entity will be able to compete more effectively with Verizon in the 4G space, improve overall network performance, and speed up what the Justice Department described as "encouraging signs" that mobile is beginning to compete effectively with wireline service. (Already, significant numbers of U.S. consumers have abandoned wireline telephone service, for example.)

How else can wireless providers improve service?

That, of course, brings up another myth about mergers, which is that they inevitably lead to declines in service quality. Again, let's do the "unthinkable" and hash that through for a moment. Quality of service even in the 3G market is a principal issue on which the competitors compete today--witness the funny (or not-so-funny) commercials all the wireless companies run denouncing the performance of everyone else.

If AT&T or any other provider genuinely wanted to improve their coverage, speed, fidelity or any other quality measure consumers value, how else besides a merger can they do it? Adding or upgrading existing infrastructure--cell towers, for example--is entirely constrained by federal, state, and local regulatory approval. And most of these regulators have proven themselves to be too slow, incompetent, and/or corrupt to allow the infrastructure investments the carriers want to make.

Another alternative is to expand coverage by using more of the radio spectrum. But spectrum is a limited resource, and the FCC has not held a significant auction since 2008. (At that auction, AT&T spent billions to acquire key blocks of the 700MHz frequency, presumably for use in deploying its future 4G service.)

As everyone knows, there are vast tracks of spectrum which are inefficiently allocated today. The National Broadband Plan, in fact, called for the FCC to identify and reallocate some 500MHz of spectrum in the next 10 years--300 MHz of it for mobile services in the next five years.

So far, however, that effort has gone nowhere. On the first anniversary of the its plan, the FCC is still splitting hairs over whether it has even gotten around to preparing an inventory of the existing allocations, as mandated last summer by President Obama.

In the absence of meaningful spectrum reform or cell tower siting rules, what else can a service provider do but acquire more frequency through merger? While the FCC dithers, industry is taking action. Mergers may not be the best way to reallocate the mess of current spectrum allocations. But waiting for the FCC will mean a slower roll-out of 4G services, and decline in overall quality as spectrum demand continues to outpace supply.

The reality of merger review is complicated

Without mergers, in other words, costs are likely to increase and consumer choice is likely to decline--not the other way around.

Again, this is also the view of the Department of Justice. In evaluating the proposed transaction, the department will continue to recognize that putting available spectrum to its best use is essential to promote, not damage, competition. In its letter to the FCC on the National Broadband Plan, the Department wrote:

Reallocating spectrum that is being underutilized would encourage the deployment of wireless services and could help to make such services more competitive with wireline offerings. First, an increase in the amount of spectrum that firms could devote to broadband would lower the cost of providing wireless broadband services and encourage entry. Second, more spectrum would allow

providers to increase the capacity and reliability of their offerings, thereby bringing them closer to cable modem and fiber-based broadband. Third, the increased capacity in the systems would help support new applications. We urge the Commission to give priority to making more spectrum available to wireless broadband providers so as to maximize their potential to compete against the established wireline ones.

As these quotes suggest, the unthinking, knee-jerk rejection of any proposed combination as an antitrust violation has little to do with the reality of how the FCC and Department of Justice should--and usually does--review proposed mergers. There is no magic formula for deciding what percentage of a relevant market an individual competitor is permitted to control. Defining the market itself is complicated, especially given different conditions in different parts of the U.S. and the potential for mobile service to compete with wireline alternatives. The influence a company has over price is affected by other factors besides direct competition, including potential substitutes and regulatory constraints.

And in a market with high fixed and sunk costs, such as mobile services, even the most aggressive antitrust review does not mean, to quote the Department of Justice once again, "striving for broadband markets that look like textbook markets of perfect competition, with many price-taking firms." Rather, the department says, "promoting competition is likely to take the form of enabling additional entry and expansion by wireless broadband providers, applying other appropriate policy levers, and spurring competition among broadband providers by improving the information available to consumers..."

The real risk here is that between the FCC and the Department of Justice (it isn't clear yet which agency will take the lead in reviewing the proposed merger), the deal won't be closed quickly, slowing the combined company's ability to deploy new 4G service to nearly everyone. The FCC's review of the Comcast-NBC merger, for example, took more than a year, despite the fact that the agency has a self-imposed (but unenforced) 180-day shot clock. After fits and starts, the approval resulted in a nearly 300-page document rife with irrelevant hand-wringing and unrelated conditions on the merged entity, including a promise to abide by the FCC's notorious net neutrality rules even if Congress or the courts ultimately overturn them.

Indeed, reviewing the sorry history of the Comcast review, FCC Commissioner Meredith Baker recently noted with characteristic understatement, "the current FCC merger review process is ripe for overhaul."

This is just a start to what will be, in the best of circumstances, a long and complicated conversation about the AT&T-T-Mobile deal. But when opponents line up to preemptively reject the deal before the details are even announced, you can count on a longer and largely pointless slog.

Thinking--and actual economic analysis-- about proposed mergers is certainly harder than blustering about the "unthinkable." But if the Washington advocacy groups actually want to do something to improve the consumer experience in mobile, they might give it a try.

Statement on AT&T's Proposed Acquisition of T-Mobile

by Mike Wendy on March 21, 2011

The following statement may be attributed to Mike Wendy, Director of MediaFreedom.org:

Alexandria, VA, March 21, 2011 – Let's take a deep breath before we rush to judgment on the proposed acquisition of T-Mobile by AT&T. We have trod over this territory before with the '96 Telecom Act. The market consolidation which ensued there, and the inter-modal competition that resulted, drove the explosive Internet we now know – the same thriving medium that the FCC wants to protect through its new Net Neutrality regulations.

While MediaFreedom does not agree with those new regulations (on many different levels), one can hardly be surprised by the unintended consequence of the agency's strong-arm tactics to cobble together its Net Neutrality "agreement." The agency's rules, with its seeming emphasis on wireless broadband, all but augured such a result to occur.

Though the public interest lobbyists have been quick to condemn the move, there is likely a happy ending to this story. The resulting company – even after the contemptible consent decree process to follow – will be better positioned to globally compete, grow and serve consumers with the broadband options and other communications services they want and desire. Further, competitors in the specific and adjacent marketplaces will compete even more vigorously to keep and grow their customer base, too.

When this happens, consumers generally win.

This is not to say that "Net Neutrality" has scored its first success, accidental as it is. Rather, it is the first real-world indication that the FCC's regulations aren't as prescient as billed by the Commission and its cheerleaders. We trust Congress will see this, and will work to properly address the FCC's bad Internet policy in the coming months ahead.

In the meantime, we hope the review process moves ahead expeditiously and narrowly so that U.S. consumers may more quickly experience the benefits of the new company.

###

AT&T and T-Mobile: Don't Rush to Regulate

By Douglas Holtz-Eakin

March 21, 2011 1:08 P.M.

The announced acquisition of T-Mobile by AT&T has started the predictable drumbeat about whether federal regulators (the Federal Communications Commission and the Justice Department) should let such a “large” firm emerge. The proposed acquisition is an important moment for the development of broadband in the United States, for competition policy more generally, and for the prospects for growth overall. So I am watching with interest how this plays out.

Monopolies are bad and the exploitation of monopoly power is against the public interest, so the first question is whether this is a monopoly. Clearly not, as T-Mobile was far from the only competitor to AT&T. Instead, this is now one large (-er) firm competing with multiple other firms (notably Verizon). The situation is more complex and the policy response important.

The first thing to note is that already we are seeing calls for a presumptive regulatory response perhaps as strong as barring the purchase. This is reminiscent of other policy debates in recent years financial services, health care, and carbon come to mind. In each case, there was an enunciated policy goal ensure adequate risk-management, lower the cost of health care and insurance, and alter the energy portfolio of the United States. And in each case, the path chosen was riddled with regulation and mandates attempting to dictate the outcome.

The alternative approach would be to harness competition to meet policy goals. Financial firms competing for scarce investor capital and customers will have natural incentives to manage their risk–return tradeoffs as long as regulations don't embody the moral hazards of too-big-too-fail. Similarly, competition among insurers and providers would be a boon to the American family or small business facing higher premiums. And finally, if one wants to reshape our energy portfolio, nothing will work quicker than dumping the legions of ineffective subsidies and intrusive regulations, and letting a simple price signal trigger competition.

The same is true in wireless broadband. Strong competition will provide the incentives for innovation, investment, and customer pricing that everyone agrees are the desirable future of this critical sectors. So why the reflexive rush to additional regulation?

Size doesn't really matter in any of these areas; competition does.

I expect that some will argue that regulations are needed to *ensure* competition. But that ignores the other strong traditional tool of competition policy: anti-trust reviews. That is, check on the *actual* state of market completion — the nearness of prices to costs, the profit rate, barriers to entry, and so forth. The FCC has long been on the wrong page on this front, preferring *ex ante*, prescriptive regulation to checking for the quality of actual competition (most notably with its repeatedly misguided attempts on network neutrality). But under both parties, the Justice Department seems also to have accepted the notion that the only goal is to write the regulatory rules. It used to be the

case that even conservatives understood the need for strong market competition and the desirability of ensuring that it takes place.

So, at least for me, the AT&T purchase of T-Mobile is another way to see whether the U.S. will continue down an overly regulatory, prescriptive approach to competition that is doomed to fail, or will instead permit firms to price, innovate, merge, and even close as they see fit, with the policymakers checking on the actual state of market competition and imposing remedies only when it is found to be inadequate.

The Conversation

The Conversation

Should Regulators Block AT&T's Acquisition of T-Mobile?

9:32 AM Tuesday March 22, 2011 by Hal J. Singer | Comments (6)

AT&T's recently announced acquisition of T-Mobile will invite hellfire from telecom regulators who fantasize over a different market structure, in which 17 mom-and-pop carriers serve the masses with tender love and care. As an economist, and as a customer of AT&T (with my mom, wife, and oldest daughter on my account), I am not so concerned about market structure. I tend to care about prices: Will this merger affect my monthly wireless bill? The answer is likely no.

Wireless telephone prices are falling, a sign of competitive markets. According to the Bureau of Labor Statistics, the CPI for "wireless telephone services" has declined every year since 2001; the same basket of wireless services in January 2011 cost consumers 12 percent less than what it cost in January 2001, and 40 percent less than what it cost in January 1998. And because the CPI cannot easily account for increases in call *quality*, this index understates the true decrease in the quality-adjusted price of wireless telephony.

According to Bank of America/Merrill Lynch Research, the average revenue per voice minute among US wireless carriers was \$0.04 in the second quarter of 2010, making US wireless telephony the most affordable in the world. It seems that every time I walk into an AT&T store, a new voice plan with more minutes allows me to reduce my monthly expenditures. And compared to the price of a movie ticket, wireless data plans starting at \$15 per month (for 200 megabytes) seem very reasonable.

Will AT&T's acquisition of T-Mobile reverse this wonderful trend? Only to the extent that T-Mobile currently imposes some price discipline on AT&T or has some unique potential to do so in the near future. This is precisely the issue on which regulators, including the Department of Justice (DOJ), will focus their attention over the next several months.

To determine whether T-Mobile constrains AT&T's prices, the DOJ could survey AT&T customers, asking them which carrier they would have chosen had they not selected AT&T. I conducted an informal survey last night with my wife, who responded: "T-Mobile? I thought they went out of business." (If only she watched more NBA on TNT, she would know that T-Mobile owns the naming rights of the halftime show!)

Had we not re-signed recently with AT&T, we likely would have switched to Verizon. Given the increasing market share of AT&T and Verizon, which between them serve 60 percent of US wireless customers according to the FCC's latest wireless competition report (pdf), I suspect our choice set represents a large swath of the population. Other households, particularly those that are most price-sensitive, could have different choice sets, and the proposed survey would identify the sources of price discipline.

To constrain the price of AT&T, T-Mobile would have to win customers at AT&T's expense whenever AT&T raises its prices. But two things will likely thwart the DOJ's ability to prove this price-disciplining effect. First, AT&T has been reducing, not increasing, its prices. According to its 2010 Annual Report, AT&T's average revenue per user ("ARPU") for voice services declined by 8.6 percent and 6.5 percent in 2010 and 2009, respectively, and its combined ARPU for voice and data services declined by 1.8 percent in 2010. Second, and more importantly, T-Mobile has been shedding, not acquiring, customers. Its net customer losses were 23,000 in the fourth quarter of 2010, and its net customer losses for customers on contracts were a staggering 318,000 in the fourth quarter of 2010. (In contrast, in 2010 Sprint reversed a trend in 2009 of shedding customers, suggesting it is better poised to constrain AT&T's prices.) This is hardly an amenable fact pattern for DOJ to tease out any substitution from AT&T to T-Mobile in response to an AT&T price increase.

It's the Prices, Stupid

In its most recent wireless competition report, the FCC attempted to measure the pricing power of AT&T and Verizon indirectly through a market structure analysis. Although market structure and the associated market shares can be helpful in assessing a firm's power over price, economists generally prefer direct evidence of a firm's pricing power. Indeed, the DOJ's and Federal Trade Commission's 2010 Merger Guidelines elevate this direct proof of pricing power over indirect methods, noting that the entire exercise of defining a market and then calculating market shares can be skipped under the right circumstances: "Such evidence also may more directly predict the competitive effects of a merger, reducing the role of inferences from market definition and market shares."

The FCC's two preferred measures of market structure—(1) revenue shares occupied by AT&T and Verizon and (2) capacity shares of "prime" spectrum owned by AT&T and Verizon—are nothing more than indirect approaches to measuring the (collective) pricing power of AT&T and Verizon. But if the FCC wants to assess whether AT&T and Verizon have pricing power, why not look at pricing evidence directly? Presumably they don't like the answer, that wireless prices are rapidly declining.

Assuming that AT&T and Verizon lack pricing power, what should one make of the "high" market shares offered by the FCC? Not much. The slowly rising revenue shares of AT&T and Verizon likely reflect the inability of Sprint (at least in 2009) and T-Mobile to retain existing subscribers, and not the ability of AT&T and Verizon to command a pricing premium.

Finally, the FCC's assertion that AT&T and Verizon dominate the "prime" spectrum located below 1000 megahertz (MHz) is not helpful in blocking a merger of AT&T and T-Mobile. According to the FCC, T-Mobile's spectrum holdings, which are located above the coveted 1000 MHz range (at 1700/2100 MHz and at 1900 MHz), are too costly to build out effectively against AT&T and Verizon. If this assertion were true, then AT&T's acquisition of T-Mobile would not eliminate a rival that currently competes effectively. Although T-Mobile might be positioned to acquire spectrum from the Upper 700 MHz D Block or from the broadcast television bands (pending Congressional approval), T-Mobile is not uniquely positioned to do so: Sprint/Nextel, Clearwire, MetroPCS, Leap Wireless, U.S. Cellular and Cellular South are poised to exploit this opportunity. Although the FCC's assertion on

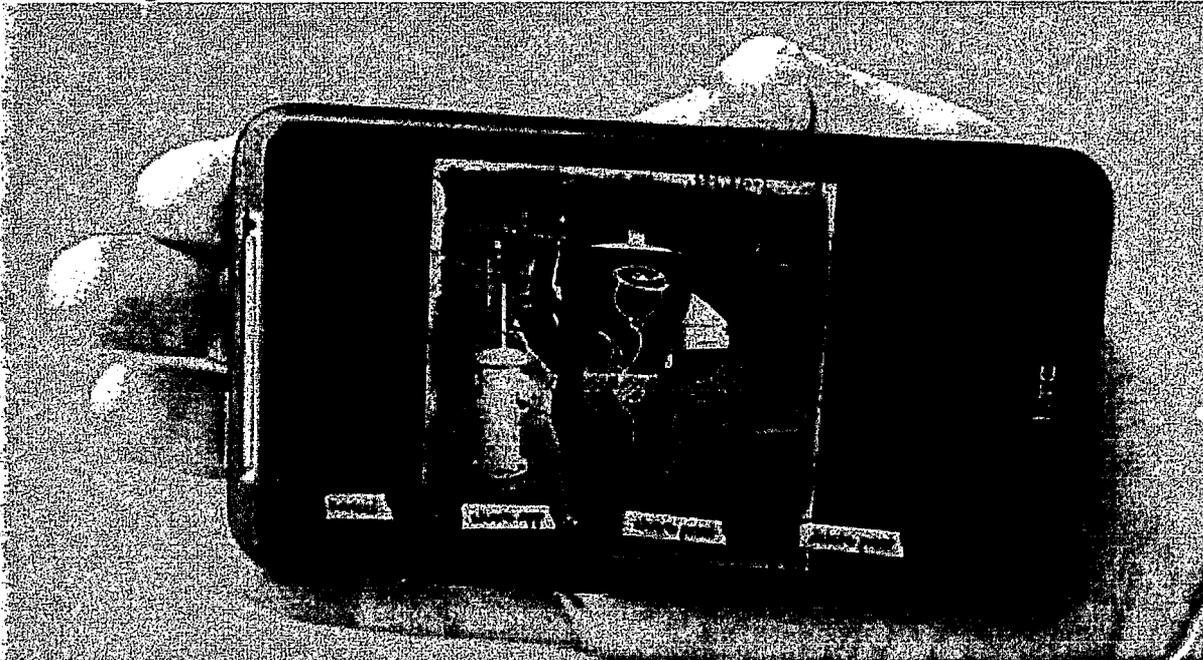
what constitutes prime spectrum might be helpful in blocking a merger of AT&T and Verizon, or barring AT&T or Verizon from purchasing all of the additional spectrum below 1000 MHz, it is not helpful here.

Efficiencies

So if AT&T can't raise its mobile prices by acquiring T-Mobile, what motivates the acquisition? That's easy: Due to explosive growth for mobile broadband data services, AT&T faces particularly significant spectrum constraints and impending spectrum exhaust in some major US markets. For example, AT&T's mobile data traffic grew 8,000 percent over the past four years, and AT&T expects

POLITICO Opinion Can you hear AT&T now?
OPINION CONTRIBUTOR

Can you hear AT&T now?



4G is a competitive threat to broadband lines tethered to Wi-Fi in homes or offices, the authors write. | AP Photo

By ROBERT HAHN & PETER PASSELL | 3/22/11 12:25 PM EDT

With its announced \$39 billion acquisition of T-Mobile USA, AT&T (<http://dealbook.nytimes.com/2011/03/20/att-to-buy-t-mobile-usa-for-39-billion/>) shows it is eager to compete big-time in the innovation game. And a good thing, too: if AT&T and other wireless heavy hitters, like Verizon, don't innovate at breakneck speed, consumers and businesses will be the losers.

Both AT&T and Verizon are already changing the nature of the Internet in fundamental ways. This new game is not just about snagging the next customer who walks in to buy an iPhone or family plan. It's a tectonic shift that could soon allow consumers to jump into a fast Internet connection anytime, anywhere.

The first tremor came with 3G services, which suggested how versatile wireless broadband could become. But 4G represents a true competitive threat to the broadband lines now tethered to Wi-Fi in homes and offices. Indeed, the faster 4G service spreads, the sooner wireless consumers will have access to the sorts of download speeds needed for HD video and other data-intensive services at prices driven ever lower by competition.

What's more, wireless 4G can allow for seamless mobility, effectively merging the fixed and mobile platforms.

Until now, the network providers have made their case for light-handed regulation in conventional economic terms. Prices have generally gone down, minutes of use have skyrocketed, and quality has generally improved. If the system ain't broke, why fix it?

But this acquisition is about the next wave of Internet innovation. The argument for allowing the combination of the second and fourth largest wireless carriers comes down to its likely effect on innovation.

([http://regulation2point0.org/wp-](http://regulation2point0.org/wp-content/uploads/downloads/2010/07/Regulating-Dynamic-Markets.pdf)

content/uploads/downloads/2010/07/Regulating-Dynamic-Markets.pdf)

To deliver on 4G's promise, tens of billions of dollars have to be invested and a variety of technologies will need to be refined. We expect that AT&T can make a pretty good case for its acquisition as the best means of getting to there from here — at top speed.

That said, the proposed marriage raises difficult questions about the concentration of wireless services in selected markets. The most serious concerns could arise in rural areas, where fewer carriers have incentives to join the competitive fray.

Yet, rural markets may be in a position to benefit most from the merger, since it offers the prospect that 4G service would leapfrog earlier technologies now used in places still struggling to attract 3G.

The big question is whether competition regulators at the Justice Department, the Federal Trade Commission and the Federal Communications Commission will focus on the dynamic benefits of more rapid innovation rather than the static costs of greater market concentration.



by Scott Cleland

THE PRECURSOR BLOG

FORWARD THINKING AT THE NEXUS OF POLICY, MARKETS AND CHANGE

About Scott Cleland



About Search & Destroy

User login

Username: *

Password: *

Log In

- Create new account
- Request new password

Search

Search this site:

Subscribe to The Precursor Blog

Enter your email address:

Subscribe

Delivered by FeedBurner

[Subscribe in a reader](#)

Recent Entries

- Google-Admeld:
- Rural Cellular's Dilemma: Can't Win the Future, Anchored to the Past
- Google's Pirate Side -- My "Daily Caller" Op-ed on DOJ's Criminal Probe of Google
- The Dangers of Over-Regulating Competition

Home

AT&T - T-Mobile: Opponents Have Competition Double Standard

Submitted by Scott Cleland on Wed, 2011-03-30 09:18

[Antitrust](#) [AT&T](#) [Competition](#) [Congress](#) [Ebay](#) [Facebook](#) [FCC](#) [FTC](#) [Google](#) [Net Neutrality](#) [Open Internet](#) [Regulation](#) [Sprint](#) [Verizon](#) [YouTube](#)

Why is there a selective political fixation on AT&T-T-Mobile's ~43% combined market share when so many related markets are dramatically more concentrated, less competitive, or even monopolized?

- This blatant competition double standard originates from the political agenda of the FreePress/Silicon Valley **net neutrality regulatory complex** that seeks a broadband industrial policy -- to create an information commons and generate tens of billions of dollars in implicit bandwidth subsidies for Silicon Valley special interests.

When the FCC does the "data-driven analysis" that it claims to value, it will discover a blatant competition double standard where broadband critics gerrymander and torture broadband market share statistics to raise the specter of a broadband "opoly" -- to justify broadband regulation.

- It is telling that opponents have to bring Verizon, which has nothing to do with the AT&T-T-Mobile transaction, into the equation in order to manufacture market shares of concern.
- The outrageous and unsubstantiated implication of opponents' "Ma Bell duopoly" narrative here is that broadband competitors will anti-competitively collude, when all the evidence is that Verizon, AT&T, Sprint, Metro PCS, Leap Wireless and others compete fiercely and relentlessly in multiple dimensions: price, value, device choice, quality, technology, plans, and innovation.

The opposition to this transaction is obviously political and a trojan horse to advance more net neutrality regulation to replace the broadband competitive marketplace with a regulated "information commons" that bestows billions of dollars in bandwidth subsidies on powerful Silicon Valley special interests and political allies.

- [Top 10 Reasons Google Has Culpability in Gmail Security Breach -- Security is Google Achilles Heel Part XII](#)

Blog Topics

**Net Neutrality FCC
Competition Congress
FTC Open Internet Antitrust**
Universal Broadband Campaigns Deregulation
Online Privacy Conflict of Interest

[more tags](#)

Links

NetCompetition.org

Monthly Archives

- [June, 2011 \(4\)](#)
- [May, 2011 \(16\)](#)
- [April, 2011 \(15\)](#)
- [March, 2011 \(15\)](#)
- [February, 2011 \(17\)](#)
- [January, 2011 \(8\)](#)
- [December, 2010 \(18\)](#)
- [November, 2010 \(18\)](#)
- [October, 2010 \(19\)](#)
- [September, 2010 \(14\)](#)

1 2 3 4 5 6 7 next
> last »

[more](#)

It is easy to test if concern about AT&T-T-Mobile market share is based on merit and the facts or whether it really is political and a stalking horse for more net neutrality regulation -- like was imposed on Comcast-NBCU as the price for that transaction's approval.

Simply ask opponents of this transaction if they are concerned or doing anything about:

- The search monopoly, Google, with 75% search share, and 94% search revenue market share, **buying the leading travel search provider, ITA Software?**
- FTC approving the Google-Admob transaction that combined Google's 25% share of in app advertising with AdMobs 50% share for a **combined 75% mobile in app advertising market share?**
- Google having **98% share of mobile search!?**
- Google Android having **53%** of the wireless OS market and projected to achieve **80% share** in a few years?
- eBay having **95%** online auction market share?
- Facebook having ~75% market share of social media revenues?

The brief illustrative data-driven analysis above proves that there is a blatant competition double standard.

- There obviously is a political campaign that focuses only on the unlikely potentiality of competition problems in broadband, while those same people totally ignore the very real and documented problems of lack of competition among Silicon Valley special interests who provide the funding for the **net neutrality regulatory complex**.

If people want to be credible in raising concerns about competition in certain markets they need to be consistent in raising concerns in any related market that has competition, dominance, or monopoly problems.

In sum, this blatant competition double standard has one obvious cause: the **net neutrality regulatory complex**, which is propelled by the twin engines of FreePress' information commons *political* agenda and Silicon Valley special interests' *economic* agenda for massively subsidized bandwidth.

» [Login or register to post comments](#)



by Scott Cleland

THE PRECURSOR BLOG

FORWARD THINKING AT THE NEXUS OF POLICY, MARKETS AND CHANGE

About Scott Cleland

Home

AT&T - T-Mobile: A Solution to Many Problems

Submitted by Scott Cleland on Mon, 2011-03-28 17:38

Antitrust AT&T Competition Congress FCC Net Neutrality Open Internet Regulation Universal Broadband Wireless Spectrum

Despite Sprint and Clearwire opposing the **proposed AT&T-T-Mobile acquisition** expect the DOJ and FCC to approve it, because the DOJ appreciates the facts of vibrant wireless competition and because the FCC will come to appreciate how the transaction actually helps solve many of the FCC's highest priority problems.

As a veteran analyst, who has closely covered most all of the roughly two dozen major communications mergers since the 1996 Telecom Act, it is easy to cut through the critics' standard, hyperbole and histrionics -- that they use to attack every major communications merger -- to get to the rub of this matter.

- The rub here is twofold:
 - First, the market competition facts of this transaction and the DOJ's many analogous precedents from previous similar mergers, provide no basis for the DOJ to try and block this merger; and
 - Second, the communication policy facts of this transaction will help solve many of the FCC's highest priority problems: promoting universal broadband, mitigating spectrum exhaust, accelerating broadband adoption, and promoting economic growth and competitiveness.

Like I **blogged** that the Comcast-NBCU merger would get approval when the hyperbole and histrionics were similarly over the top and not credible, this acquisition ultimately will gain government approval.

- It is only a matter of how long it will take and what concessions special interests will be able to extort as the transaction runs through the FCC's outrageously long approval gauntlet.

I. Competitive Facts

In all of the previous analogous communications transactions to this one, the DOJ has analyzed them by *local geographic market*, not by national market as opponents suggest in their criticism. As AT&T has indicated, and the CTIA confirms in its research, there are **5+ wireless competitors in 18 of the top 20 markets** and there are four in most other relevant markets.

- There may be a small percentage of markets that the DOJ believes could be problematic, but the remedies for that narrow problem have been implemented many times before -- so its no deal-

Opponents' "Ma Bell duopoly" political/PR frame of this transaction shows that opponents have already conceded defeat on the facts at the DOJ. It also shows they are already focusing most all their efforts on persuading the FCC to extort concessions under the FCC's amorphous "public interest" test, which is basically whatever three votes at the FCC say it is at any point in time.

- However, **it does not pass the antitrust laugh test** when the #3 competitor in the U.S. wireless market, Sprint, the **67th largest U.S. company** (corrected) with ~\$32b in revenues, ~50 million customers, ~40,000 employees, and the **most spectrum** in both absolute and per customer terms, argues politically that they are **competitively irrelevant to the market or consumers**.
- What is really going on is that opponents of this merger know they have to scream "opoly" in order to generate concern and get attention in Washington.
 - However, opponents also know that they would have zero credibility if they tried to claim this transaction would result in a wireless **monopoly**, and that they would be giggled at if they tried to claim this transaction would cause a **triopoly**, **quadopoly** or a **quintopoly**.

The competitive facts overwhelmingly support approval of the acquisition.

- Wireless consumers enjoy fierce relentless competition for their business and benefit from dynamic multi-dimensional competition on price/value, pricing plans/models, network quality, technologies, business models, handset/device choice, and innovation.

II. A Solution to Many Problems

Universal Broadband: After the President **pledged** in January: "*within the next five years, we'll make it possible for businesses to deploy the next generation of high-speed wireless coverage to 98% of all Americans.*" and after the FCC made universal broadband deployment the signature goal of the FCC in its National Broadband Plan to Congress in 2010, it is hard to imagine the FCC blocking a clearly legal transaction that actually fulfills with great fanfare what the President and FCC have said they most want to do in this sector.

Spectrum Exhaust: After the FCC has repeatedly stated publicly that mobility is the communications future, and that the problem of spectrum exhaust is real and imminent, it is hard to imagine the FCC blocking a legal transaction that helps mitigate the most immediate problem for consumers at risk from the consequences of spectrum exhaust, i.e. higher prices for high bandwidth usage to reduce demand and stave off spectrum exhaust.

- Simply it is more efficient, effective and timely for AT&T to buy the spectrum it needs now in the marketplace than to wait potentially years for the FCC to get and auction additional spectrum from the U.S. Government.

Accelerating Broadband Adoption: Given the FCC's National Broadband Plan goals of accelerating broadband adoption, it is hard to imagine the FCC blocking a legal AT&T-T-Mobile transaction that would result in much faster broadband adoption with combined resources and synergies than would occur with AT&T and T-Mobile remaining separate. Moreover, the transaction would bring the iPhone to T-Mobile customers who otherwise would not gain access to it.

- Simply, blocking this transaction would not achieve accelerated broadband adoption like approving this transaction would.

Promoting Economic Growth & Competitiveness: After the President instituted a new **Executive Order** to promote economic growth and competitiveness via a regulatory system of "least burdensome regulation," it is hard to imagine the FCC employing maximally burdensome regulation by blocking a legal transaction that transfers **\$21b** in revenues and scarce spectrum resources from *foreign* control to *U.S.* control.

- Simply, it would be extremely difficult for the FCC to make the case that Deutsche Telecom, which has been trying to sell T-Mobile because it does not want to invest the resources necessary to grow T-Mobile's broadband business, would somehow invest more in T-Mobile's network than AT&T would.
- It is obvious that the U.S. would be more competitive and grow faster if AT&T were to invest several billion dollars more into T-Mobile's business and network than Deutsche Telecom would.

In sum, the DOJ is not going to block this transaction because the facts don't merit it and the DOJ has tried and true targeted remedies that can mitigate any anti-competitive effects around the edges that they may find in their review.

The FCC is also not going to block this transaction when it helps the FCC solve many of its highest priority problems.

- And as the FCC tries to determine what concessions it wants to try and politically bestow on special interests, it will find that, in part, it is negotiating against itself, as onerous conditions on AT&T could undermine expeditious solutions to the FCC's highest priority problems of: promoting universal broadband, avoiding spectrum exhaust, accelerating broadband adoption, and promoting economic growth and competitiveness.

» [Login or register to post comments](#)

• [News](#) [Web](#)

HUFFPOST BUSINESS

Search News and Topics

[Like](#)
312K

CONNECT

Will Marshall

President and Founder, Progressive Policy Institute

Posted: March 24, 2011 03:10 PM

Labor Boosted by Proposed Merger

America's embattled labor movement hasn't had much to celebrate lately, so it's worth noting when a major union welcomes a business mega-merger.

The Communications Workers of America strongly endorsed AT&T's proposed \$39 billion acquisition of T-Mobile. Deals this big -- the merger would create the nation's largest mobile-phone carrier, with about 39 percent of the market -- have to run a bruising, multiple-agency regulatory gauntlet. Some consumer groups worry that it will reduce competition in the lucrative telecommunication sector, dampening incentives for innovation and possibly pushing up consumer prices.

No doubt the deal merits close scrutiny. But having one of America's largest private unions (700,000 strong) in its corner can't hurt AT&T's chances.

C.W.A. represents 42,000 AT&T wireless workers and regards the company as reasonably friendly to unions. The merger gives it a better shot at organizing T-Mobile workers in the U.S. and in Germany (the company is owned by Deutsche Telekom, whose stock zoomed after the announcement.) For those workers, being absorbed into AT&T will mean "better employment security and a management record of full neutrality toward union membership and a bargaining voice," said C.W.A. president Larry Cohen.

This rare bit of good news for organized labor follows successful efforts by Republican governors in several states to curtail public workers' right to collective bargaining. Although polls show majorities of Americans are opposed to denying bargaining rights, high profile battles in

Wisconsin, Indiana and New Jersey have drawn the public's attention to the adverse impact on state budgets of generous compensation schemes for state employees, especially pension and health care benefits.

This is a huge problem for organized labor, which in recent decades has experienced growth only in the public sector. The picture is especially dismal in the private sector, where less than eight percent of workers are unionized.

If they are going to reverse their long pattern of decline, U.S. labor unions need to redefine their economic role and relevance to American workers in a post-industrial economy. Cohen's statement pointed to a mission that would be good for both U.S. workers and employers: building modern infrastructure to underpin America's ability to win in global markets. "For more than a decade, the United States has continued to drop behind nearly every other developed economy on broadband speed and build out," he said.

In fact, a big national infrastructure push represents common ground on which big labor and big business can meet. In an "odd couple" pairing last week, AFL-CIO President Rich Trumka and Tom Donahue, head of the U.S. Chamber of Commerce, showed up to endorse a new proposal for a national infrastructure bank. Drafted by a bipartisan group of U.S. Senators including John Kerry, Mark Warner and Kay Baily Hutchinson, the bank would leverage billions of private investments in new transport, energy and water projects.

If labor and business can get behind an ambitious project for "internal national building," our equally polarized political parties surely should be able to follow their example. And that bodes well for an American economic comeback.

at&t t-mobile merger

More in Business...

- Comments
- 10
- Pending Comments
- 0
- [View FAQ](#)

View All
Recency |
Popularity

AT&T + T-Mobile: The merger that was hiding in plain sight

March 20, 2011 — 5:40pm ET | By Roger Entner

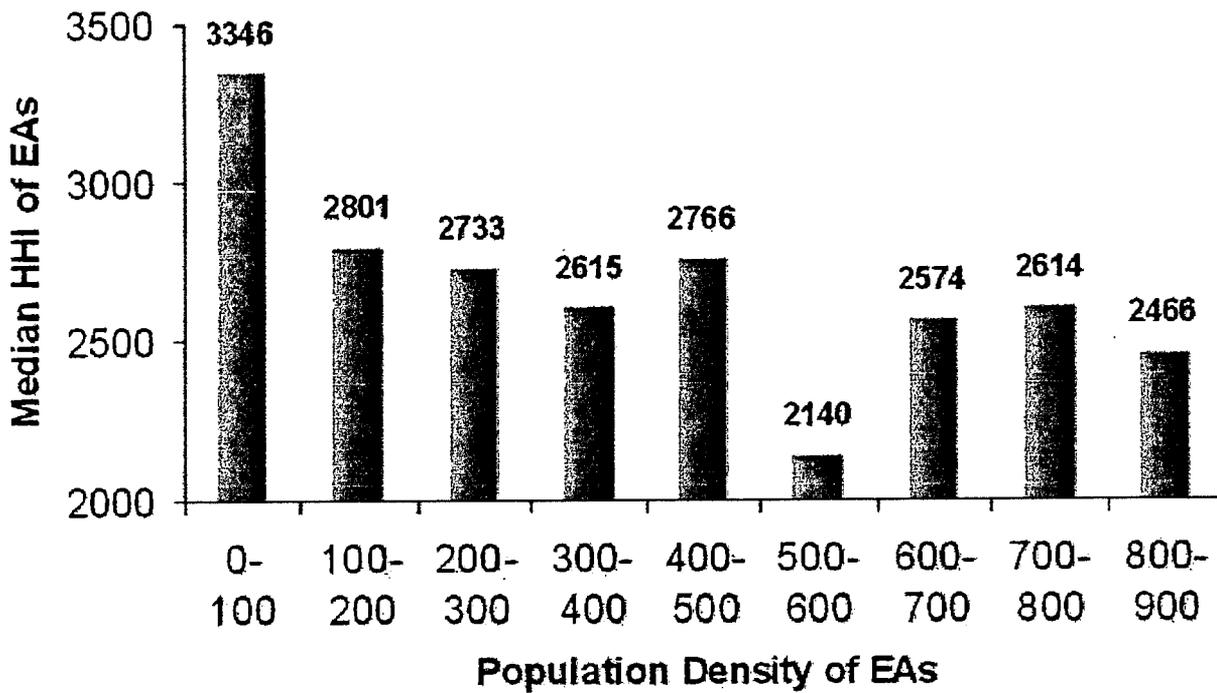
Deutsche Telekom, which acquired VoiceStream for \$24 billion in 2001, is profitably exiting a growing headache. It also brings to a conclusion Philipp Humm's five-month mission to either turn around the operation or to sell it. T-Mobile USA customers who have suffered through years of underinvestment in T-Mobile's network are joining an operator with a track record of bringing innovation to Americans.

Unlike the rumored combination of T-Mobile and Sprint, which never made much sense on so many levels, the AT&T/T-Mobile combination provides a clear technology roadmap with a straightforward integration path that will let T-Mobile and AT&T customers escape an impending capacity crunch. With a minimum eight- to ten-fold increase in data usage until 2015, wireless operators do not have the luxury to wait for the promised 500 MHz of spectrum to be cleared and auctioned by the FCC, but have to act now.

The merger will increase cell site density in urban markets by 20 percent to 40 percent improving customer experience immediately. In addition, AT&T commits to bringing LTE to 95 percent of all Americans. This is more than the 90 percent that Verizon has announced to cover with LTE and very close to this administration's goal to bring broadband to 98 percent of the population. With an additional \$8 billion over seven years investment of AT&T in its network due to this merger, the positives for AT&T and T-Mobile customers are significant.

The proposed acquisition will be closely scrutinized in Washington, D.C. Both the FCC and the Department of Justice have a generally less hospitable attitude towards industry consolidation than the previous administrations, an attitude perhaps heightened by staff that has spent time at "big is bad" advocacy organizations, where they have generally argued against such mergers. It will remain to be seen if their arguments against similar mergers when they were on the outside will carry more weight now that they are among the decision makers on the inside.

One of the critical measures both the DOJ and the FCC look at is the Herfindahl-Hirschman Index. The FCC in its 14th CMRS Report determined that the Herfindahl-Hirschman Index (HHI) weighted by population was 2848 in 2008, a value that is one of the lowest in the world. In the past, such mergers were evaluated on a market-by-market basis. The below table from the FCC's 14th CMRS Report shows us the HHI's of individual markets by population density.



Source: 14th CMRS Report, FCC 10-81

As the table shows us in metropolitan markets the HHI is significantly below 2800. Only, the most rural markets with a population density of less than 100 is pushing the HHI above 2800. Since T-Mobile is generally not active in these rural markets the HHI will therefore not move or can easily be remedied through a divestiture.

The other big wildcard in the HHI analysis is TracFone. The FCC has traditionally excluded TracFone, the fifth largest service provider in the United States from its HHI analysis because it argued that MVNOs, in general, were unable to effectively compete against facilities-based operators and because it lacked market share data on a market-by-market level. TracFone's success over the last few years clearly shows they are more than able to compete against facilities-based operators. In 2010 alone, they grew faster than Sprint, T-Mobile, U.S. Cellular, and MetroPCS combined. If market share data by market for TracFone becomes available to the FCC and it recalculates the HHI on that basis, the HHI inevitably will drop.

The expected market entrance of LightSquared, which was significantly aided by the FCC's decision to waive the ATC requirement could also reduce anti-trust concerns as a new entrant is coming to the market. At the same time, the FCC argued in its justification for their approval of the waiver "that LightSquared's network will enhance competition for terrestrial mobile wireless broadband services, giving consumers additional options when choosing a broadband service provider."

This merger is both an opportunity and risk for Sprint. It will allow Sprint to more clearly define itself as the value leader in the U.S. market and create more space for it in that segment. The announcement of this deal could serve as a wakeup call that it needs to reap more quickly the benefits from its Clearwire relationship and from its Network Vision initiative.

In summary, the FCC and DOJ have to decide to break with the past of looking at the mere number of providers and instead looking at the track record of companies bringing innovation to Americans. It also has to recognize that T-Mobile's parent is clearly interested to reduce its exposure to the U.S. market and take that into account when making a decision.

Roger is Analyst and Founder of Recon [Analytics](http://www.reconanalytics.com). www.reconanalytics.com

Representative Corrine Brown

Representing the 3rd Congressional District of Florida

[Home](#) [About Me](#) [Our District](#) [Constituent Services](#) [Grants & Scholarships](#) [Press Room](#)

Are you in my district?

[Click here to find out](#)

[Contact Me](#)

[Home](#) [News Items](#) [Press Releases](#)

Congresswoman Brown's Statement on AT&T's Investments in Jacksonville

In This Section

April 12, 2011 | [Press Releases](#)

[PRINT](#) | [EMAIL](#) | [TWITTER](#) | [FACEBOOK](#)

I was thrilled to learn of AT&T's plans for improvements in its network in the Greater Jacksonville area in 2011. This new investment builds on nearly \$300 million the company has spent here the last two years. The construction is good for the local job market in the short run and the enhanced access and speeds will benefit consumers and business throughout the Third District in the long run. Broadband access is becoming increasingly tied to the success and vitality of communities across America. These new investments demonstrate that AT&T shares the confidence in the vitality of Greater Jacksonville that I have always had.

[PRINT](#) | [EMAIL](#) | [TWITTER](#) | [FACEBOOK](#)

[↑RETURN TO TOP](#)

T&E Analysis on AT&T/T-Mobile Merger

April 1, 2011

Technology & Entrepreneurs

AT&T/T-Mobile Merger: It's 2011, Not 1911

by Raymond J. Keating

Looking at some of the responses to the proposed merger between AT&T and T-Mobile, one has to wonder if this is 2011 or 1911 when it comes to technology, markets and regulation.

During the last years of the nineteenth century and into the early twentieth century, competition in telephone service reduced prices and expanded market penetration. However, telephone service was quickly coming under increased regulation, with state regulating bodies springing up, and American Telephone & Telegraph was moving to consolidate the industry and eventually becoming a government-sanctioned monopoly.

The telecommunications world could not be more different in the early twenty-first century. Competition flourishes, with consumers, including small businesses, having multiple choices in broadband wireless and wireline services. Investment and innovation are improving services and multiplying choices for individual and business consumers. Technology is changing rapidly, with advancements making the future of telecommunications laden with new opportunities for entrepreneurs and consumers. Dynamism reigns, and consumers have the ultimate say as to what works and what does not.

Indeed, not only is today's telecommunications marketplace dramatically different from a century ago, but it's strikingly altered since just a decade ago. Prices have fallen and service has improved. A July study from the Government Accountability Office (GAO) reported that "the average price for wireless service in 2009 was approximately 50 percent of the price in 1999," concluding that "consumers are generally getting more wireless services (such as more voice minutes of use) for lower costs than they were 10 years ago."

The proposed \$39 billion purchase of T-Mobile USA by AT&T would make AT&T the largest wireless provider in the U.S. Currently, Verizon has the most cellular subscribers, followed by AT&T, Sprint and T-Mobile. However, as the GAO noted, more than 140 companies offer wireless services.

Despite all of this vitality, some of the arguments against or warnings about this merger sound like they could have been uttered in 1911.

Consider reported comments from Democratic FCC Commissioner Michael Copps. As noted in a March 31 *TheHill.com* story, Copps said the merger faced a tougher route compared to the merger of Comcast and NBC Universal: "This is maybe even a steeper climb from the standpoint of a lot of power and a lot of influence given to one company in a world where two companies are going to control around 80 percent [of the market]." The piece went on: "Copps raised concerns that the merger review would 'suck the oxygen out of the room' for telecom issues before Congress and at the Federal Communications Commission, and suggested strong conditions might not be enough to justify a combination of this magnitude."

However, the notion that two firms could somehow dominate a market, with the implication that consumers would suffer, runs against the technological, competitive and market realities at hand. No matter the current market share in a dynamic market, one must continue to innovate and serve customers well. If not, market share and profits will be lost to existing, emerging and future competitors. Quite simply, consumers have options.

Nonetheless, on March 28, competitor Sprint Nextel officially came out against the merger. The company's statement correctly pointed out, "The wireless industry has sparked unprecedented levels of competition, innovation, job creation and investment for the American economy." But it then added, "all of which could be undone by this transaction." That's a dramatic assertion, again especially given the competitive and technological realities of the marketplace.

Vonya McCann, Sprint Nextel vice president of government affairs, declared: "Sprint urges the United States government to block this anti-competitive acquisition. This transaction will harm consumers and harm competition at a time when this country can least afford it. As the first national carrier to roll out 4G services and handsets and the carrier that brought simple unlimited pricing to the marketplace, Sprint stands ready to compete in a truly dynamic marketplace. So on behalf of our customers, our industry and our country, Sprint will fight this attempt by AT&T to undo the progress of the past 25 years and create a new Ma Bell duopoly."

It is clear from this statement that Sprint is not really interested in competing in the marketplace. Instead, it wants the government to stop a merger that could create a more capable competitor. If the rumored Sprint/T-Mobile merger had materialized, it's clear that the firm would have been singing a different tune on this kind of merger.

Interestingly, some wisdom regarding the government's potential reaction to the AT&T/T-Mobile merger came from another top competitor. As reported by *TheHill.com* on March 31, Verizon policy executive Tom Tauke warned that the merger should not serve as a vehicle for increased regulation. Tauke was quoted: "We do not want the government to use this transaction as a vehicle for government management of the marketplace." He added that it would be a "perversion of the process" if conditions not related to the merger were imposed, while also observing that reviews by both the FCC and the Department of Justice were duplicative.

Good points. The government must resist the temptation to use this proposed merger as a vehicle for new regulation. In fact, it should refrain from issuing dictates on the merger itself.

Entrepreneurs and small businesses certainly could see tremendous benefits from the proposed AT&T/T-Mobile merger in terms of potential gains in efficiencies and costs, resulting in improved service, expanded offerings, lower prices, along with increased opportunities for entrepreneurial firms to aid in the expansion of broadband investment and innovation, and to expand services and products given the expanded reach of broadband wireless among consumers.

Even from a small business perspective, big is not necessarily bad. After all, small firms certainly can benefit from the positives that result from economies of scale. If service is improved and costs reduced, then it's certainly a plus for entrepreneurs and their employees.

In the end, the determination of whether or not a merged AT&T and T-Mobile serves customers well should be determined in the marketplace, not through a political process. It's 2011, not 1911. Let's hope policymakers realize this and do not interfere with the market process.

Raymond J. Keating serves as chief economist for the Small Business & Entrepreneurship Council.

" protecting small business, promoting entrepreneurs "

[SBEC ISSUES](#) | [LEGISLATIVE ACTION](#) | [NEWS & FEATURES](#) | [RESOURCES](#) | [GET INVOLVED](#) | [CONTACT US](#) | [PRIVACY](#) | [HOME](#)

2944 Hunter Mill Road | Suite 204 | Oakton, VA 22124 | Phone (703) 242-5840 | Fax (703) 242-5841

Copyright 1994 - 2011 Small Business & Entrepreneurship Council

Monday, March 21, 2011

AT&T's Acquisition of T-Mobile USA an Important and Positive Development for Consumers and U.S. Economy

Connecting all Americans to reliable, high-quality broadband remains an important national initiative – particularly for U.S. entrepreneurship and small business owners. That is why SBE Council continues to support policies that encourage investment in our nation's broadband infrastructure and the expansion of a robust network.

As I have noted in many policy pieces and communications with President Obama and the Federal Communications Commission (FCC), private sector investment is the surest way to bring the power of broadband to every American. That investment is critical to U.S. competitiveness, where businesses and entrepreneurs are utilizing and tapping into the broadband network as it is serving as a critical platform for innovation and growth opportunities. So, efforts by our nation's telecommunications sector that stand to improve the network and connect more Americans to broadband should be applauded by consumers, government officials and policy leaders. This weekend's announcement that AT&T will acquire T-Mobile USA is one such development.

The acquisition means that network quality will improve for existing customers of both companies as the integration of their assets will strengthen their delivery of service. Significantly, according to a media release, "AT&T commits to a significant expansion of robust 4G LTE (Long Term Evolution) deployment to 95 percent of the U.S. population to reach an additional 46.5 million Americans beyond current plans – including rural communities and small towns."

Of course, this means more Americans and small business owners will have access to high-quality broadband, which is a top priority for President Obama and the FCC as outlined in their National Broadband Plan. According to AT&T, the acquisition will bring advanced LTE capabilities to more than 294 million people. This is fantastic news, and of course being done without government money.

In his State of the Union speech, and in many public appearances that have followed, President Obama said he wants to make America "the best place on earth" for business. If he and his Administration are serious about this stand, they will cheer this critically important acquisition and allow it to move quickly to a close.

Karen Kerrigan, President & CEO

THE WALL STREET JOURNAL.

WSJ.com

MARCH 23, 2011

AT&T's Big Bet on Spectrum Folly

The merger between AT&T and T-Mobile is a vote of impatience with Washington's proposed fix for the mobile spectrum crisis.

BY HOLMAN W JENKINS JR

Every time FCC Chief Julius Genachowski touts the administration's broadband plan, the looming wireless crisis becomes more dire. He told an audience in North Carolina last month: "The spectrum crunch is real. If we don't do something about it we'll face lousy service and sky-high consumer prices."

He won't like it, but he pretty much got what he was asking for on Sunday with AT&T's proposal to buy T-Mobile, which the parties are selling precisely as a cure to the crunch Mr. Genachowski keeps going on about.

It would be vulgar to say that official Washington and various "public interest" groups now are wetting themselves in anticipation of politically torturing the AT&T deal, which would merge the second and fourth biggest mobile providers. The parties, however, obviously like their regulatory chances. They undoubtedly have their eyes on a Republican Congress. They have Mr. Genachowski's own words about a looming spectrum crisis. They also have his own Hindenburg of a solution foundering in Congress even as the AT&T deal runs the gauntlet of political approval.

To begin with, talking about a spectrum shortage is a bit like talking about a real-estate shortage. There is plenty of real estate, most of it of little value because it's in places where nobody wants it.

The same is true of spectrum. In a few places like New York City or San Francisco, concentrated populations of mobile users are overwhelming local cell towers. But these dense markets also attract lots of players, so there would be no shortage of competitors even with the AT&T deal. This is precisely why, on closer inspection, the parties have a surprisingly strong argument that their merger would allow better service, lower costs and more efficient use of existing spectrum without hurting consumers.

To pile up the irony, Mr. Genachowski will probably end up treating AT&T's quick and ready solution to the spectrum problem as a threat to his own precious if convoluted solution, which he has been shouting from the hilltops. His plan is a "grand bargain" in which TV broadcasters would "voluntarily" surrender part or all of their underutilized spectrum in return for some kind of gratuity.

THE WALL STREET JOURNAL.

WSJ.com

Associated Press

Not without merits, this plan would have to be steered through Congress past the braying of powerful interest groups. It would take years and years to implement. It also happens to stand in the way of a much cleaner and simpler alternative.

To wit, AT&T, whose network in New York is sagging from all its iPhone users, could walk over to any broadcaster in New York with the following proposition: You aren't getting much value from your broadcast spectrum because most of your viewers are on cable or satellite. Why not lease some of that spectrum to us for mobile broadband?

In about two weeks, a "crisis" the FCC might or might not solve in 10 years would be materially alleviated.

Unfortunately, this would require the FCC to show some willingness effectively to deregulate broadcast license holders to do new things with their spectrum, which so far it hasn't. Hence a subtle pickle for the FCC. The AT&T deal, and even more its \$39 billion price tag, is a bet on spectrum scarcity—the scarcity that the FCC's license Raj needlessly exacerbates. It's a bet, too, that Mr. Genachowski's "grand bargain" won't help in a time frame relevant to the company's business survival.

Though junky language sometimes suggests otherwise, the FCC can't "find" or "create" more spectrum. Allocation is the whole story, and that's a problem the agency controls and can fix without additional rigmarole. The only substantive objection is that taxpayers, who own the public airwaves, wouldn't get a fair shake if broadcast licensees were set free to redeploy their spectrum to mobile broadband. But this is misleading. Under existing law, taxpayers are already entitled to 5% of the revenues if broadcasters turn their spectrum to new uses. If that's not enough, Congress could always raise it to 10% or 15%.

So why not do it? Never mind that Mr. Genachowski's own spectrum plan implicitly treats over-the-air broadcast as economically and socially null. Overseeing these same broadcasters

is how the agency still justifies much of its staff and budget. Think about it: In our slovenly media world, the FCC still keeps busy with a backlog of nearly one million complaints of "indecent" on the public airwaves. Likewise, the regular license-renewal follies, in which broadcasters tout their "public interest" bona fides, is a lobbyist piffata the agency would be loath to give up.

All this merely highlights, however, the appeal of back-door deregulation, since broadening the powers of existing licensees is the path forward least likely to provoke intractable opposition. Broadcasters would have every incentive to move spectrum to its most rewarding uses. Sprint, LEAP, MetroPCS and wireless resellers would have that much more opportunity to upset the big boys, AT&T and Verizon.

ACAP Enabled

**List of Other Supporting Statements Filed With the FCC
as of June 3, 2011**

A. Philip Randolph Institute, Washington, DC

- Benefits the African American community

Acadian Ambulance Service, Richard E. Zuschlag, Lafayette, LA

- Benefits the healthcare industry

AFL-CIO Philadelphia Council, Patrick Elding, Philadelphia, PA

- Good for job stimulation

AFL-CIO, Washington, DC

- Good for job stimulation

Alabama Juvenile Diabetes Research Foundation, Chris Strong, Birmingham AL

- Benefits the healthcare industry

Alabama Rural Health Association, Dale Quinney, Pike Road, AL

- Benefits the rural communities

Alabama Songwriter's Guild, Dennis Kahler, Garden City, AL

- Good for small business development

Alamo Council of the Blind, San Antonio, TX

- Benefits Americans with disabilities

Alaska AFL-CIO

- Good for job stimulation

Alaska Black Chamber of Commerce

- Benefits the African American community

Alaska Eye Physician and Surgeon Association, Carl Rosen, Past President

- Benefits the healthcare industry

Allan Baucom, Inc. (filed under "Allan Baucum"), A.L. Baucom, Monroe, NC

- Benefits agriculture industry

Alton Drew Group, Alton Drew, Atlanta, Georgia

- Benefits consumers

American Action Forum, Douglas Holtz-Eakin, Washington, DC

- Good for competition

American Agri-Women, Manhattan, KS

- Benefits women and the agriculture industry

American Council of the Blind, Arlington, VA

- Benefits Americans with disabilities

American Council of the Blind, Ken Shuler, Birmingham, Alabama

- Benefits Americans with disabilities

American Foundation for the Blind, New York, NY

- Benefits Americans with disabilities

American Homeowners Grassroots Alliance, Arlington, VA

- Benefits rural communities

Americans for Prosperity, Carol Weston, Augusta, ME

- Benefits job stimulation and rural communities

Shuler, Inc., Frank Calabrese, McMechen, WV

- Benefits job stimulation and rural communities

Arizona Free Enterprise Club

- Good for competition

Arizona Parents for Education

- Benefits the educational system

Arkansas Association of Two Year Colleges

- Benefits the educational system

Arkansas Council of Communications Workers of American (CWA) Unions, Hot Springs, AR

- Benefits job stimulation and rural communities

Arkansas Department of Rural Services, Butch Calhoun

- Benefits rural communities

Arkansas Hospital Association, Robert 'Bo' Ryall

- Improves access to quality healthcare

Arkansas Hospitality Organization

- Benefits small business development

Arkansas Municipal League, Don A. Zimmerman

- Good for business development

Arkansas State Chamber and Associated Industries, Randy Zook

- Benefits rural communities and business development

Arkansas State Chamber of Commerce, Bob Lamb, Former EVP

- Good for business development

Arkansas Trucking Association

- Benefits shipping and transportation industry

Asian American & Pacific Islander Health Forum, San Francisco CA

- Benefits Asian Americans and the healthcare industry

Asian American Business Development Center, John Wang, New York, NY

- Good for business development

Asian American Business Development Center, New York, NY

- Good for business development

Asian Business Association, Los Angeles, CA

- Benefits Asian Americans and business development

Asian Pacific Islander American Public Affairs Association, Sacramento, CA

- Benefits the Asian American community

Asian Pacific Islander American Scholarship Fund, Washington, DC

- Benefits Asian Americans and the education system

Asian Women in Business, New York, NY

- Benefits Asian Americans and business development

ASPIRA Association, Washington, DC

- Benefits the Hispanic community and the education system

Associated Industries of Florida, Barney Bishop, Tallahassee, FL

- Good for business development

Association of County Mayors of Tennessee, Nashville, TN

- Benefits rural communities

Association of Range Consultants, Belgrade, MT

- Benefits rural communities

Association of Washington State Hispanic Chambers, Cristobal Guillen

- Benefits Hispanic communities

Atchison Area Chamber of Commerce, Atchison, KS

- Good for business development

Aurora Economic Development Council, Wendy Miller, CEO, Aurora, CO

- Benefits small business development

Austin & Rogers, P.A., Columbia, SC

- Good for job stimulation

AZ 22nd Navajo Nation Council, Walter Phelps, Window Rocks, AZ

- Benefits the American Indian community

Baltimore County Chamber of Commerce, Keith Scott, Towson, MD

- Good for business development

Belzoni-Humphreys Development Foundation Inc., Belzoni, MS

- Benefits rural communities and business development

Better Business Bureau of Arkansas, Inc.

- Good for business development

Birmingham Business Resource Center, Robert Dickerson Jr., Birmingham, AL

- Good for business development

Black Business Association of Memphis, Roby Williams, Memphis, TN

- Good for business development

Black Economic Council, Latino Business Chamber of Greater Los Angeles and the National Asian American Coalition

- Benefits minority business community

Board of Hennepin County Commissioners, Jeff Johnson, Minneapolis, MN

- Benefits consumers

Board of Supervisors, County of Sacramento, Roberta MacGlashan, Sacramento, CA

- Benefits consumers

Brain Injury Association of Oregon, Molalla, OR

- Benefits rural communities and the healthcare industry

Brian Allmer Radio Network, Briggsdale, CO

- Benefits rural communities

Bronx Chamber of Commerce, Lenny Caro, Bronx, NY

- Benefits consumers

Burnsville Chamber of Commerce, Daron Van Helden, Burnsville, MN

- Benefits job growth and small business development

Business Controls, Inc, Steve Foster, Greenwood Village, CO

- Benefits small business development

California Asian Pacific Chamber of Commerce

- Benefits Asian American community and small business development

California Hispanic Chamber of Commerce

- Benefits Hispanic community and business development

California Journal for Filipino Americans

- Benefits Asian Americans and journalism

California Manufacturers & Technology Association, Jack Stewart

- Benefits consumers

Cannon Cockers Association in Lawton, Leo J. Baxter, Lawton, OK

- Benefits rural communities and business development

Carbon Disclosure Project, New York, NY

- Benefits the economy and the environment

Casa Y Comunidad, Arcos, La Rumba, Nicolas Amos, Baltimore, MD

- Good for job stimulation

Cass/Atlantic Development Corporation (CADCO), Robert Camblin, Atlantic, IA

- Good for business development

CCP, Inc., Doug Colglazier, Rozel, KS

- Benefits rural communities and business development

Center for Accessible Living, Keith Hosey, Louisville, KY

- Benefits Americans with disabilities

Center for Education, Business, and the Arts (CEBA), Kanab, UT

- Benefits rural communities and business development

Central California Hispanic Chamber of Commerce

- Benefits the Hispanic community

Central City Association of Los Angeles

- Benefits business development

Central Connecticut Chambers of Commerce, Michael Nicaastro

- Benefits small business development

Central Iowa Power Cooperative, Dennis L. Murdock

- Benefits rural communities

Chamber of Commerce of Eastern Connecticut , Thomas (Tony) Sheridan

- Benefits small business development

Chattanooga Technology Council, Chattanooga, TN

- Good for business development

City of Firebaugh CA, Jose Ramirez, City Manager

- Benefits rural communities

Coalition of Black Trade Unionists, Washington, DC

- Benefits African Americans and union labor

Coalition of Organizations for Accessible Technology (COAT), Washington, DC

- Benefits Americans with disabilities

Coalition of Texans with Disabilities, Dennis Borel

- Benefits Americans with disabilities

Cobb Chamber of Commerce, Rob Garcia, Marietta, GA

- Benefits business development

Colorado Software Industry Association (CSIA) / Colorado's Technology Association, Su Hawk

- Benefits small business development

- Columbia Chamber of Commerce, Columbia, SC
- Benefits the African American community
- Columbia Urban League, James T. McLawhorn, Jr., Columbia, SC
- Benefits the African American community
- Columbine Health Plan, David McReynolds, Denver, CO
- Benefits small business development
- Commissioner Gary Black, Georgia Department of Agriculture, Atlanta, GA
- Benefits rural communities and business development
- Commissioner of Agriculture Hugh Weathers, Columbia, SC
- Benefits agribusiness
- Commissioner Todd Staples, Texas Department of Agriculture
- Benefits rural communities; good for consumers
- Committee on Better Racial Assurance, William Saunders, Charleston, SC
- Benefits minority communities
- CommScope, Eddie Edwards, Hickory, NC
- Good for business development and consumers
- Communications Workers of America (CWA) District 2, Ronald D. Collins, Bowie, MD
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) District 4, Frank Mathews, North Barrington, IL
- Good for job stimulation and consumers
- Communications Workers of America (CWA) District 4, Ron Honse, North Barrington, IL
- Good for consumers and job stimulation
- Communications Workers of America (CWA) District 7, Jay Boyle, Greenwood Village, CO
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 1298, William Henderson III, Hamden, CT
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 3301, Derrek Thaker, Bowling Green, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3304, Thomason Smith, Danville, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3305, Nick Hawkins, New Castle, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3309, Shane Wadley, Paducah, KY
- Good for consumers and job stimulation

- Communications Workers of America (CWA) Local 3310, James Carrico, Louisville, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3313, Keith Taylor, Middlesboro, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3314, Judy Hasty, Owensboro, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3315, John D. Fleming, Benton, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3317, Clay Corbett, Alley, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3321, Jonathan Campbell, Richmond, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3327, Jeff McMillan, Lexington, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3370, Randy Jones, Lexington, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 3371, Phil Coldiron , Rush, KY
- Good for consumers and job stimulation
- Communications Workers of America (CWA) Local 4700, Debbie Sturgeon, Evansville, IN
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 4900, Tim Strong, Indianapolis, IN
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 6300, Michael T. Mehringer, St. Louis, MO
- Benefits low-income and minority communities; good for job stimulation
- Communications Workers of America (CWA) Local 6301, Sandy Grogan, Springfield, MO
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 6327, Anetra Sessions, Kansas City, MO
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 6327, Sheryl Janeski, Kansas City, MO
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 6327, Tanya Holmes, Kansas City, MO
- Good for consumers, business development and job stimulation
- Communications Workers of America (CWA) Local 7000, Linda Hatfield, Tucson, AZ
- Good for consumers, business development and job stimulation

Communications Workers of America (CWA) Local 7201, Steve Lewsader, Little Canada, MN

- Good for consumers, business development and job stimulation

Communications Workers of America (CWA) Local 7777, Lisa Bolton, Englewood, CO

- Good for consumers, business development and job stimulation

Communications Workers of America (CWA), District 7, Kay Pence, Urbandale, IA

- Good for consumers, business development and job stimulation

Communications Workers of America (CWA), Indiana State Council

- Good for business development and job stimulation

Communications Workers of America (CWA), Washington, DC

- Good for consumers, competition and job stimulation

Communications Workers of America Local 1103, Kevin Sheil, Port Chester, NY

- Good for business development and job stimulation

Communications Workers of America Local 1122, James M. Wagner, Buffalo, NY

- Good for consumers, business development and job stimulation

Communications Workers of America Local 1180, Arthur Cheliot, New York NY

- Good for job stimulation

Communications Workers of America Local 2006, Wheeling, WV

- Good for consumers, business development and job stimulation

Communications Workers of America Local 2201, Amanda Casey, Raven, Virginia

- Good for job stimulation

Communications Workers of America Local 2201, Avis Rathky, Lebanon, VA

- Good for job stimulation

Communications Workers of America Local 2201, Barbara Johnson, Lebanon, VA

- Good for job stimulation

Communications Workers of America Local 2201, Barbara Thompson, Gate City, VA

- Good for job stimulation

Communications Workers of America Local 2201, Billy Harrison, Pounding Mill, Virginia

- Good for job stimulation

Communications Workers of America Local 2201, Curtis Casey, Swords Creek, VA

- Good for job stimulation

Communications Workers of America Local 2201, Darin France, Castlewood, VA

- Good for job stimulation

Communications Workers of America Local 2201, Deborah Casey, Swords Creek, VA

- Good for job stimulation

- Communications Workers of America Local 2201, Dereck Rose, Tazewell, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Derek Hal, Honaker, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Dorris Stanley, Castlewood, VA
- Good for business development and job stimulation
- Communications Workers of America Local 2201, Guy Castle, Castlewood, VA
- Good for consumers, business development and job stimulation
- Communications Workers of America Local 2201, J. Ballance, Lebanon, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Jeanne Kennessey, Honaker, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Kevin Kenship, Honaker, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Kimberly Thompson, Tazewell, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Lisa Salyer, Coeburn, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Mary Le Hegy, Norton, VA
- Good for job stimulation and business development
- Communications Workers of America Local 2201, Marye Roulett, Norton, VA
- Good for consumers and job stimulation
- Communications Workers of America Local 2201, Michelle Reed, St. Paul, VA
- Good for business development and job stimulation
- Communications Workers of America Local 2201, Missy Roark, Big Stone Gap, VA
- Good for consumers, business development and job stimulation
- Communications Workers of America Local 2201, Pat Turner, Abingdon, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Patty Bonds, Richlands, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Sandra Lee, Cleveland, VA
- Good for job stimulation
- Communications Workers of America Local 2201, Sharon Harrison, Pounding Mill, VA
- Good for consumers and job stimulation

Communications Workers of America Local 2201, Stephanie Arrington, Raven, VA

- Good for job stimulation

Communications Workers of America Local 2201, Sylvia Chafin, Castlewood, VA

- Good for job stimulation

Communications Workers of America Local 2201, Tabitha Lowe, New Post, VA

- Good for job stimulation

Communications Workers of America Local 2201, Tammy Turner, Abingdon, VA

- Good for job stimulation

Communications Workers of America Local 2201, Teresa Joyce, Doran, VA

- Good for job stimulation

Communications Workers of America Local 2201, Tiffany Patrick, Richmond, VA

- Good for job stimulation

Communications Workers of America Local 2201, Valerie Castle-Stanley, Richmond, VA

- Good for business development and job stimulation

Communications Workers of America Local 2201, Valerie Kelley, Richmond, VA

- Good for consumers and job stimulation

Communications Workers of America Local 2202, Virginia Beach, VA

- Good for consumers, business development and job stimulation

Communications Workers of America Local 2204, Salem, VA

- Good for consumers, business development and job stimulation

Communications Workers of America Local 2222, James W. Hilleary, Annandale, VA

- Good for consumers, business development and job stimulation

Communications Workers of America Local 2275, Woodbridge, VA

- Good for consumers, business development and job stimulation

Communications Workers of America Local 3805, Ray Mehaffey, Knoxville, TN

- Good for consumers, business development and job stimulation

Communications Workers of America Local 4300, Ronald Gay Jr., Canfield, OH

- Good for consumers, business development and job stimulation

Communications Workers of America Local 4302, Bob Wise, Akron, OH

- Good for consumers, business development and job stimulation

Communications Workers of America Local 4603, Milwaukee, WI

- Good for consumers, business development and job stimulation

Communications Workers of America Local 4671, Sun Prairie, WI

- Good for consumers, business development and job stimulation

Communications Workers of America Local 6222, Houston, TX

- Good for consumers and job stimulation

Communications Workers of America Local 7800, Seattle, WA

- Benefits low-income and minority communities; good for job stimulation

Communications Workers of America Locals 7301, 7303 & 7304, Bismarck, ND

- Benefits rural and underserved communities; good for job stimulation

Communications Workers of America of North Carolina, Tom Coley, Greensboro, NC

- Benefits rural and underserved communities; good for job stimulation

Communications Workers of America, Elaine Harris, International Rep, Charleston, WV

- Benefits rural communities; good for job stimulation and business development

Communications Workers of America, Madelyn Elder, Portland, OR

- Good for business development and job stimulation

Communications Workers of America, Wisconsin Political Council

- Good for business development and job stimulation

Community Youth Center, San Francisco, CA

- Benefits Asian-American community

Congress of California Seniors , Henry "Hank" Lacayo, State President

- Benefits seniors

CONNECT, Washington, DC

- Good for technological innovation, competition, consumers and business development

Consortium for Worker Education, New York, NY

- Benefits the educational system; good for job stimulation

Consumer Policy Solutions, Deb Berlyn, Washington, DC

- Benefits rural communities, healthcare-related services and educational system

Contra Costa Council, Concord, CA

- Good for innovation and consumers

Contra Costa Hispanic Chamber of Commerce, Walnut Creek, CA

- Benefits Hispanic communities and business development

Councilman Adam Hornung, Lincoln, NE

- Benefits rural communities; good for business development

Councilmember Brad Colglazier, Rozel City Council, Rozel, KS

- Benefits rural communities; good for job stimulation and business development

County Executive Dan Onorato, Allegheny County, Pittsburgh, PA

- Benefits consumers, business development and job stimulation

Covington County Chamber of Commerce, Marie Shoemake, Collins, MS

- Benefits business development

Crystal Springs Chamber of Commerce, Donna Wells, Crystal Springs, MS

- Benefits rural communities

Cutthroat Cabling, Hayden Lake, ID

- Good for business development

Danville-Boyle Chamber of Commerce, Mike Perros, Danville, KY

- Good for job stimulation

Dayton Chamber of Commerce, Tammy Pratka, Dayton, TX

- Benefits rural Americans

Delaware State AFL-CIO, Samuel E. Latham

- Benefits minorities and unions

Delaware State Chamber of Commerce, James A. Wolfe, Wilmington, DE

- Good for economic development

Delawareans for Environmental and Economic Development, A. Richard Heffron

- Good for small business development

Delegate James Shuler, Virginia House of Delegates, Richmond, VA

- Benefits public safety and education

Delegate Watkins Abbitt, Virginia House of Delegates, Richmond, VA

- Provides access to educational and job opportunities, government programs and more

Denver Metro Chamber of Commerce, Kelly Brough, Denver, CO

- Good for small business development

Deputy Mayor John Alcala, Topeka, KS

- Good for economic development

Disability Power & Pride, Washington, DC

- Benefits Americans with disabilities

Duncan Chamber of Commerce, Chris Deal, Duncan, OK

- Good for business development

East Bay Economic Development Alliance, Oakland CA

- Good for business development

Eastern Ohio Development Alliance, Cambridge, OH

- Good for economic development

Economic Development Alliance of Jefferson County, Lou Ann Nisbett, Pine Bluff, AR

- Good for economic development

Economic Development Director, Ted Fisher , Sapulpa OK

- Good for business development

Educational Programs Inspiring Communities, Inc., Houston, TX

- Benefits Americans with disabilities

El Dorado County Boys and Girls Club, Placerville, CA

- Benefits children

El Paso Hispanic Chamber of Commerce, El Paso, TX

- Benefits Hispanic communities and business development

Ely City Council, Heidi Omerza, Ely, MN

- Good for economic development

e-NC Authority, Jane Patterson, Raleigh, NC

- Benefits low-income Americans

Enid Chamber of Commerce, Enid, OK

- Good for economic development

Ennis Chamber of Commerce, Ennis, TX

- Good for economic development and job stimulation

Enterprise Consulting, Inc., Lenexa, KS

- Good for small business development

Enterprise Hawaii, Oahu Economic Development Board, Pono Shim

- Good for economic development

Entropy Economics, Bret Swanson, Zionsville, IN

- Best means for meeting rapid growth in demand

Epic Aviation, Scott Walker, Salem, OR

- Good for small business development and innovation

Equality Pennsylvania, Ted Martin

- Benefits LGBT community

Eskaton Foundation, Carmichael, CA

- Benefits the healthcare industry

Eunice Chamber of Commerce, Michelle DeRouen, Eunice, LA

- Benefits the education system

Eunice Committee on Economic Development, Don Reber, Eunice, LA

- Good for small business development

Excellis, Michael Lesich, Roseville, MI

- Good for small business development

Filipina Women's Network, San Francisco, CA

- Benefits Filipino community

Filipino American Arts Exposition, San Francisco, CA

- Benefits Filipino community

Firewall Ministries, Andy Fernandez, Davie, FL

- Benefits minority and low-income communities

First State League of United Latin American Citizens Council (LULAC), Sandra Bucay, Wilmington, DE

- Benefits Latino community

Flagstaff Chamber of Commerce, Flagstaff, AZ

- Benefits rural and Native American communities

Flight Safety International, Kevin Betts, Wichita, KS

- Good for small business development

Florida Alliance for Retired Americans, Tony Fransetta, Wellington, FL

- Benefits seniors

Florida International University, Dario Moreno, Miami, FL

- Benefits the education system

Florida Tax Payers Union, John Hallman, Orlando, FL

- Good for economic development

Fogarty Center, Ted Polak, North Providence, RI

- Benefits the education system and disabled Americans

Food Producers of Idaho, Rick Waitley

- Benefits rural communities

Former Congressman Jim Barcia, Michigan, 5th District, Bay City, MI

- Good for business development

Former Member W. Edwin McMahan, North Carolina General Assembly, Charlotte, NC

- Good for business development

Former Representative Dan Johnson, Kansas State Legislature, Hays, KS

- Good for business development and job stimulation

Former State Senator Ben Vidricksen, Salina, KS

- Good for business development and job stimulation

Former U.S. Chamber of Commerce Chairman Van Smith, Muncie, IN

- Benefits rural communities and good for business development and job stimulation

Forward Sumner Economic Partnership, Jimmy Johnston, Hendersonville, TN

- Benefits rural communities and good for economic development

Fox Cities Chamber of Commerce, Shannon Meyer, WI

- Good for business development and job stimulation

Freeport Launch Services, John Hoss, Freeport, TX

- Good for small business

Fresno Area Hispanic Chamber of Commerce, Fresno, CA

- Benefits Hispanic community and good for business development

Genova Technologies, Dawn Ainger, Cedar Rapids, IA

- Good for business and innovation in rural communities

Georgia Chamber of Commerce, Chris Clark

- Good for economic investment and job stimulation

Georgia Conservation Voters, Rob Teilhet

- Good for economic stimulation and the environment

Georgia Highlands College Foundation, J. Randy Pierce, Rome, GA

- Good for education, economic growth, and job stimulation

Georgia Partnership for Telehealth, Paula Guy

- Benefits the healthcare industry

Glendale Chamber of Commerce, Glendale, CA

- Best means of meeting rapid growth in demand

GMEC-AHEC, Lebanon, VA

- Benefits healthcare in rural communities

Gourley Properties, Paul Gourley, President, Sioux Falls, ND

- Good for economic development and innovation

Grand Canyon Hotel Operators, Flagstaff, AZ

- Benefits small businesses

Grant County Economic Growth Council, Tim Eckerle, Marion, IN

- Good for job stimulation and rural communities

Great Valley Center, Modesto, CA

- Good for businesses and economic development

Greater Columbia Chamber of Commerce, Mike Brenan, Columbia, SC

- Good for economic development and innovation

Greater Danbury Chamber of Commerce, Stephen A. Bull, Danbury CT

- Good for economic development and job stimulation

Greater Enid Chamber of Commerce, Jon Blankenship, Enid, OK

- Good for economic development

Greater Las Vegas Association of Realtors, Sean Fellows, Las Vegas, NV

- Good for business development

Greater Lehigh Valley Chamber of Commerce, T. Anthony Ianelli, Allentown, PA

- Good for economic development

Greater New Haven Chamber of Commerce, Anthony Rescigno, New Haven, CT

- Good for small business development

Greater Owensboro Chamber of Commerce, Jody Wassmer, Owensboro, KY

- Good for economic development

Greater Palm Bay Chamber of Commerce, Vicki Northrup, FL

- Good for small business development

Greater Philadelphia Hispanic Chamber of Commerce, Philadelphia, PA

- Benefits Hispanic business community

Greater Philadelphia Hispanic Chamber of Commerce, Varsovia Fernandez, Philadelphia, PA

- Benefits Hispanic business community

Greater Raleigh Chamber of Commerce, Drew Moretz, Raleigh, NC

- Good for business development

Greater Seattle Chamber of Commerce, Seattle, WA

- Good for business development

Greater Shelby County Chamber of Commerce, Jennifer Trammell, Shelby, AL

- Good for economic development and job stimulation in rural communities

Greater Tulsa Hispanic Chamber of Commerce, Francisco Trevino, Tulsa, OK

- Benefits Hispanic business community

Hawaii AFL-CIO, Randy Perreira, Honolulu, HI

- Good for economic development and job stimulation

Hawaii Teamsters and Allied Workers Local 996, Millie Downey, Honolulu, HI

- Good for business development and job stimulation

Health Tech Strategies, Neal Neuberger, McLean, VA

- Benefits the healthcare industry

Hennepin County Commissioners, Minneapolis, MN

- Benefits healthcare industry, public safety and education

Hispanic 100, Mario Rodriguez, Chairman, San Clemente, CA

- Benefits Hispanic business interests

Hispanic Chamber of Commerce of Metropolitan St. Louis, St. Louis, MO

- Benefits Hispanic business interests and rural communities

Hitz Builders, Bob Hitz, President, Garden City, KS

- Benefits rural communities

Houston Hispanic Chamber of Commerce, Houston, TX

- Benefits Hispanic business and community interests

Howell Petroleum Products, Bill Howell, Brooklyn, NY

- Benefits minority-owned business interests

Idaho Associated General Contractors of America, Mark Dunham, Boise, ID

- Benefits rural communities and business development

Idaho Association of Realtors, Kevin Price, Boise, ID

- Good for rural communities and broadband deployment

Idaho Retailers Association, Pam Eaton, Boise, ID

- Benefits rural communities and business development

Institute for Leadership Education, Advancement and Development, Reading, PA

- Benefits low-income Americans

Illinois Chamber of Commerce, Doug Whitley, Springfield, IL

- Benefits business development

Illinois Hispanic Chamber of Commerce, Omar Duque, Chicago, IL

- Benefits Hispanic and other minority business interests

Illinois Retail Merchants Association, David Vite, Chicago, IL

- Benefits underserved and rural communities

Independent Business Association of Wisconsin, Steve Kohlmann

- Good for small business development

Indiana Manufacturers Association, Patrick J. Kiely

- Good for job stimulation

Indiana Telecommunications Association, John Koppin, Indianapolis, IN

- Good for job stimulation and broadband deployment

Infanger Insurance, John and Deby Infanger, Gooding, ID

- Benefits rural communities and small business development

Innovate and Educate NM, Jamai Blivin, Santa Fe, NM

- Benefits the educational system

Innovate Anderson, Mike Panasco, Anderson, SC

- Good for job stimulation and infrastructure development

INRS Technology Partners, Jamie Courtney, Prairieville, LA

- Benefits rural communities and small business development

Instituto Laboral De La Raza, Sarah Shaker, San Francisco, CA

- Benefits low-income Americans and underserved communities

International Brotherhood of Electrical Workers, Local 103, Dorchester, MA

- Good for job stimulation and broadband deployment

International Center on Law & Economics, Portland, OR

- Good for competition and consumers

International Union of Engineers, Communications Workers of America Local 82161, Vickie Hurley, Salem, VA

- Good for job stimulation and infrastructure development

Internet Innovation Alliance, Washington, DC

- Benefits underserved and rural communities

Iowa AFL-CIO, Ken Sagar, Des Moines, IA

- Benefits underserved and rural communities

Iowa Association of Business and Industry, Michael Ralston, Des Moines, IA

- Benefits diverse business development and rural communities

Iowa Great Lakes Association, Phil Petersen

- Benefits the environment and rural communities

Japanese American Citizens League/Leadership for Asian Pacifics, Inc., San Francisco, CA

- Benefits Asian-American community

Jobs and Housing Coalition (Oakland), Oakland, CA

- Good for job stimulation and development

Jobs with Justice, Washington, DC

- Good for job stimulation and underserved communities

Johnson Timber, William Johnson, Jr., Hayward, WI

- Benefits rural communities and small business development

Joint African American 3Ps, Washington, DC

- Benefits African Americans and job stimulation

Joint Digital Entrepreneurs, Washington, DC

- Benefits minority businesspersons and entrepreneurs

Joint Diversity Supplier, World Wide Technology, Washington, DC

- Benefits minority, women, and disabled veteran entrepreneurs

Joint Hispanic, Washington, DC

- Benefits Latino and underserved communities

Joint LGBT (GLAAD & NGLCC), Washington, DC

- Benefits underserved and discriminated communities

Joint NCBCP Black Women's Roundtable/National Council of Negro Women, Washington, DC

- Good for job stimulation and underserved communities

K9s4COPs, Houston, TX

- Benefits law enforcement and public safety

Kansas Black Republican Council (KBRC), Treatha Brown-Foster, Wichita, KS

- Benefits small and minority-run businesses

Kansas Council for Economic Education, Wichita, KS

- Benefits the education system

Kentucky Association for Economic Development (KAED), Mike Mangeot, Frankfort, KY

- Benefits economic development and small businesses

Kentucky Chamber of Commerce, Dave Adkisson, Frankfort, KY

- Benefits small business development

Kilgore Chamber of Commerce, Mike Coston, Kilgore, TX

- Benefits small business development

Korean American Federation of Orange County, Garden Grove, CA

- Benefits Asian American community

Labor Council for Latin American Advancement, Central Florida Chapter, Victor Sanchez, Winter Park, FL

- Benefits low income and Hispanic community

Lake Champlain Regional Chamber of Commerce, Tim Shea, Burlington, VT

- Benefits small business development

Latin Business Association, Los Angeles, CA

- Good for business development

Latino Action Network, Frank Argote-Freyre, Freehold, NJ

- Benefits Latino business community

Latinos in Information Sciences and Technology Association (LISTA), New York, NY

- Benefits Latino business development

Law Offices of Brad Sahl, Brad Sahl, Raleigh, NC

- Good for business development

Leadership East Kentucky, Linda Gayheart, Hindman, KY

- Good for business development

Lieutenant Governor Jay Dardenne, Baton Rouge, LA

- Benefits rural communities

Lincoln Training Center, Caron Nunez, President, South El Monte, CA

- Benefits people with disabilities

Local 761, IUE-CWA, Jerry Carney, Louisville, KY

- Good for business development

Lone Star Leadership and Policy Center, Houston, TX

- Benefits education system and rural communities

Maine Heritage Policy Center, J. Scott Moody, Portland, ME

- Benefits rural communities

Majority Deputy Whip Mike Cierpiot, Missouri House of Representatives, Jefferson City, MO

- Good for business development

Maritime Trades Council of Greater Boston and New England AFL-CIO, Dorchester, MA

- Good for business development

Marshall County Economic Development Council, Guntersville, AL

- Benefits rural communities

Maryland Chamber of Commerce, Kathleen T. Snyder, Annapolis, MD

- Good for business development

Marysville Tulalip Chamber of Commerce, Tulalip, WA

- Benefits small business development

Matanuska Sustina School District, Lynn Gattis, School Board Member, Wasilla, AK

- Benefits education system and rural communities

Mayor Cedric Glover, Shreveport, LA

- Benefits rural communities

Mayor Claud "Rusty" Moody, Eunice, LA

- Benefits rural communities

Mayor George K. Heartwell, Grand Rapids, MI

- Benefits public safety and rural communities

Mayor Harold Rideau, Baker, LA

- Benefits rural communities

Mayor John Peyton, Jacksonville, FL

- Good for business development

Mayor Lee Faber, Eastover, SC

- Benefits low income and rural communities

Mayor Mark Stodola, Little Rock, AR

- Good for business development

Mayor Michael Hobart, Sioux City, IA

- Benefits community development

Mayor Randy Roach, Lake Charles, LA

- Good for business development

Mayor Robert Cluck, Arlington, TX

- Promotes public health and safety

McAlester Defense Support Association (MDSA OK), Mark Jordan, McAlester, OK

- Good for business development

Mendocino County Office of Education, Mendocino, CA

- Benefits education system

Merced County Economic Development Corporation, Merced, CA

- Benefits the rural business community

Metro Atlanta Chamber, Sam Williams, Atlanta, GA

- Good for business development

Metropolitan Milwaukee Association of Commerce, Milwaukee, WI

- Good for business development

Miami Overseas Chinese Association, Miami, FL

- Good for Asian American business development

Mica Ferguson, Communications Workers of America Local 2201, Mica Ferguson, Lebanon, VA

- Good for job stimulation

Michigan Association of United Ways, Scott Dzurka, Lansing, MI

- Benefits community development

Michigan Citizen Action, Linda Teeter, Kalamazoo, MI

- Benefits rural communities

Michigan Forest Products Council, Kevin Korpi, Lansing, MI

- Benefits industry in remote locales

Michigan State AFL-CIO, Mark Gaffeny, Lansing, MI

- Benefits union labor workers

Midlands Community Development Corporation, William Loyd, Columbia, SC

- Good for business development

Ministerial Alliance Against the Digital Divide, Chicago, IL

- Benefits low income and minority communities

Minnesota AFL-CIO, Shar Knutson, President, St. Paul, MN

- Benefits union labor and rural communities

Minnesota Business Partnership, Charlie Weaver, Minneapolis, MN

- Good for business development

Minnesota Communications Workers of America (CWA) State Council, Mona Meyer, Minneapolis, MN

- Benefits union labor

Minnesota State Building and Construction Trades Council, Harry Melander, St. Paul, MN

- Benefits union labor and job stimulation

Minnesota UNITE HERE, Local Union 17, Wade Luneberg, Minneapolis, MN

- Benefits union labor and rural communities

Mississippi Black Chamber of Commerce, J.R. Jones, Tougaloo, MS

- Benefits African American business development

Mississippi Coalition for Citizens with Disabilities, Mary Troupe, Jackson, MS

- Benefits people with disabilities and rural communities

Mississippi Cultural Crossroads, Tara Y. Wren, Port Gibson, MS

- Benefits rural communities

Mississippi Republican Party, Brad White, Braxton, MS

- Benefits rural communities

Missouri AFL-CIO, Hugh McVey, Jefferson City, MO

- Benefits union labor and job stimulation

Missouri Chamber of Commerce, Jefferson City, MO

- Benefits small business development

Missouri Merchants and Manufacturers Association, Chesterfield, MO

- Benefits small business development

Missouri Paraquad, Robert Funk, St. Louis, MO

- Benefits Americans with disabilities

Moberly Area Economic Development Council, Moberly, MO

- Good for business development

Mobile Area Education Foundation, Mobile, AL

- Benefits education system and rural communities

Montana Association of Realtors, Helena, MT

- Benefits rural business development

Montana Building Industry Association, Helena, MT

- Benefits rural communities

Montana Business Leadership Council, Helena, MT

- Benefits rural communities and business development

Montana Farmers Union, Great Falls, MT

- Benefits rural business development

Montana State AFL-CIO, Al Ekblad, Helena, MT

- Benefits consumers and union labor

Montana Teamsters Union Local No. 190, Jim Larson, Billings, MT

- Benefits union labor and rural communities

NAACP, Arkansas State Conference, Dale Charles

- Benefits the African American community

NAACP, Columbia, South Carolina

- Benefits minority and rural communities

NAACP, Florida State Conference, Adora Obi Nweze, Fort Lauderdale, FL

- Benefits community development

NAACP, Jackson-Madison County, Jackson, TN

- Benefits low income and minority communities

NAACP, Missouri State, Mary Ratliff, St. Louis, MO

- Benefits the African American community

NAACP, North Carolina State Conference, Rev. Dr. William J. Barber II, Durham NC

- Benefits low income and rural African American communities

NAACP, Ohio Conference, Sybil Edwards-McNabb, Columbus, OH

- Benefits the African American community and rural areas

NAACP, Waukesha County Branch, WI

- Good for business development

National Association for Moms in Business, Henderson, NV

- Benefits working mothers

National Caucus and Center on Black Aged, Washington, DC

- Benefits African American elder care

National Coalition for Public School Options, Arlington, VA

- Benefits the educational system

National Disability Institute, Washington, DC

- Benefits Americans with disabilities

National Federation of Filipino American Associations Region 8 Northern California, San Francisco, CA

- Benefits the Filipino American community

National Federation of Independent Business, Randi Thompson, Carson City, NV

- Benefits rural communities and business development

National Federation of Independent Business, W.T. Butcher, Bismarck, ND

- Benefits small business development

National Hispanic Caucus of State Legislators, Washington, DC

- Benefits Hispanic business development and communities

National Hispanic Professional Organization, Houston, TX

- Benefits small business development

National Industries for the Blind, Alexandria, VA

- Benefits Americans with disabilities

National Latina Business Womens Association, Central CA

- Benefits Hispanic business development and communities

National Medical Association, Kweisi Mfume, Silver Spring, Maryland

- Benefits the African American community

National Multiple Sclerosis Society, AL-MS chapter, Whitney Taylor, Birmingham, AL

- Benefits the healthcare industry

National Organization of Black Law Enforcement Executives (NOBLE), Alexandria, VA

- Benefits public safety

National Puerto Rican Coalition, Washington, DC

- Benefits the Puerto Rican community

National Urban League, Mark H. Morial, New York, NY

- Benefits the African American community

Nebraska Farmers Union, John Hansen, Lincoln, NE

- Benefits rural communities

Nebraska Taxpayers for Freedom, Doug Kagan, Omaha, NE

- Benefits rural communities

Nevada Farm Bureau, Doug Busselman, Sparks, NV

- Benefits rural agribusiness

Nevada Rural Legislators, Las Vegas, NV

- Benefits rural communities

New Hampshire Institute of Politics, Neil Levesque, Manchester, NH

- Benefits the educational system

New Jersey AFL-CIO, Trenton, NJ

- Benefits union labor and job stimulation

New Jersey Chamber of Commerce, Thomas A. Bracken, Trenton, NJ

- Good for business development

New Jersey Conference of Mayors, David Del Vecchio, Trenton, NJ

- Benefits rural communities

New York AFL-CIO, Denis Hughes, New York, NY

- Benefits union labor

Noah Project, Leigh Ann Fry, Abilene, TX

- Benefits rural community safety

Nokia Siemens Networks US LLC, Ricky Corker, President, Irving, TX

- Benefits consumers

Norfolk County Treasurer Joseph Connolly, Dedham, MA

- Good for business development

North Carolina AFL-CIO, James Andrews, Raleigh, NC

- Benefits union labor and job stimulation

North Carolina Institute of Minority Economic Development, Andrea Harris, Durham NC

- Benefits minority business development and communities

North Dakota AFL-CIO, Dave Kemnitz, Bismarck, ND

- Benefits rural communities and business development

North Dakota Chamber of Commerce, Andy Peterson, Bismarck, ND

- Good for business development

Northeast Ohio Hispanic Chamber of Commerce, Stephanie Mercado, Cleveland, OH

- Benefits the Hispanic community

NYC Central Labor Council, Denis Hughes, New York, NY

- Benefits union labor and job stimulation

Ogallala Comfort Company, Herb Knudsen, Ogallala, NE

- Good for business development

Ohio AFL-CIO, Tim Burga, Columbus, OH

- Benefits consumers

Ohio Council of Retail Merchants & Affiliates, John C. Mahaney, Jr., Columbus, OH

- Benefits small business development

Oklahoma Farm Bureau, Mike Spradling, Oklahoma City, OK

- Benefits rural agribusiness

Oklahoma Minority Supplier Development Council, Deborah Ponder-Nelson, Oklahoma City, OK

- Benefits minority business development

Oklahoma State Senate President Pro Tempore Brian Bingman, Oklahoma City, OK

- Good for business development and job creation

Oklahoma State University, Tom F. Grey, Stillwater, OK

- Benefits rural communities and business development

Ombrella, Inc., Laurie Simon, Kirkland, WA

- Benefits small business development

Oregon AFL-CIO, Salem, OR

- Benefits union labor and business development

Oregon Business Association, Tigard, OR

- Good for business development

Oregon United Food and Commercial Workers Union (UFCW) - Local 555, Jeff Anderson, Tigard, OR

- Benefits union labor

Orgain, Bell & Tucker, LLP, Michael J. Truncale, Beaumont, TX

- Benefits consumers

Paducah NAACP (NAACP), Danny Fugate / Rosa Scott, Paducah, KY

- Benefits African Americans and low income communities

Palmetto AgriBusiness Council, Bob Battle, West Columbia, SC

- Benefits agribusiness

Pauls Valley Chamber of Commerce, Della Wilson, Pauls Valley, OK

- Benefits rural business development

Pelican Institute for Public Policy, Kevin Kane, New Orleans, LA

- Benefits business development

Pennsylvania Cyber Charter School, Nick Trombetta, Midland, PA

- Benefits the educational system

Pennsylvania Independent Oil and Gas Association, Louis D'Amico, Wexford, PA

- Benefits rural business development

Pennsylvania State Grange, Carl Weiss, Lemoyne, PA

- Benefits rural communities

Philadelphia Council AFL-CIO, Patrick Eiding, Philadelphia, PA

- Benefits community development

Philadelphia Federation of Teachers, Jerry Jordan, Philadelphia, PA

- Benefits the educational system

Pioneer Electric Cooperative, Steve Harmon, Greenville, AL

- Benefits agribusiness

Platinum Corral, Billy Sewell, Jacksonville, NC

- Good for business development

Plymouth Area Chamber of Commerce, Kevin O'Reilly, Plymouth, MA

- Benefits small business development

Portland Business Alliance, Portland, OR

- Good for business development

Portland Hispanic Metropolitan Chamber, Portland, OR

- Benefits the Hispanic community

Precursor LLC, Scott Cleland, McLean, VA

- Good for competition

President of the Utah State Senate, Michael Waddoups, Salt Lake City, UT

- Good for business development

President Pro Tempore Anthony DeLuca, Delaware Senate, Dover, DE

- Good for business development and job stimulation

Raise Foundation, Santa Ana, CA

- Benefits consumers

Regal Rubber Company, Matt Adams, Gastonia, NC

- Benefits small business development

Reno Sparks Chamber of Commerce, Fred Boyd, Reno, NV

- Benefits small business development

Representative Peter Illoway, Wyoming State Legislature, Cheyenne, WY

- Benefits rural communities and healthcare

RGF Inc., Fred Ramos, Oklahoma City, OK

- Benefits small business development

Richard Charette, United Food and Commercial Workers Union (UFCW) Local 1445, Dedham, MA

- Benefits union labor

Richard Gephart, Gephart Hill Properties & Construction, Raleigh, NC

- Benefits small business development

Richmond Chamber of Commerce, Mendi Goble, Richmond, KY

- Benefits community development

River Heights Chamber of Commerce, Jennifer Gale, Inver Grove Heights, MN

- Benefits small business development

RLJ-McLarty-Landers Automotive Holdings, Little Rock, AR

- Benefits small business development

Rochvarg & Meehan LLC, Stephen Z. Meehan, Chestertown, MD

- Benefits rural business development

Rogers-Lowell Area Chamber of Commerce, Rogers, AR

- Benefits small business development

Rural Enterprises of Oklahoma, Durant, OK

- Benefits rural business development

Sacramento Department of Police, Ken Bernard, Sacramento, CA

- Benefits public safety

Safranek, Inc., Craig Safranek, Merna, NE

- Benefits rural business development

Salt Lake Chamber of Commerce, Salt Lake City, UT

- Benefits business development

San Francisco Chamber of Commerce, San Francisco, CA

- Benefits small business development

San Gabriel Valley Economic Partnership, Irwindale, CA

- Promotes economic growth opportunities

San Joaquin County Hispanic Chamber of Commerce, Stockton, CA

- Benefits business development

SC Association of Community Development Corporations, Charleston, SC

- Benefits consumers

SC Department of Education, Columbia, SC

- Benefits the educational system

Sea Island Comprehensive Health Care Corporation, Everard O. Rutledge, Johns Island, SC

- Benefits rural healthcare

SEIU New Jersey State Council, Lizette Delgado-Polanco, Newark, NJ

- Benefits consumers and union labor

Senate Speaker Pro Tempore Jamie Woodson, Tennessee State Senate, Knoxville, TN

- Benefits rural communities and the educational system

SeniorNet, John Alger, Director of Operations, Herndon, VA

- Benefits senior citizens

SER Jobs for Progress, Ignacio Salazar, Irving, TX

- Benefits job development

Shreveport Bossier African American Chamber of Commerce, Booker White, Chairman, Shreveport, LA

- Benefits business development

SIEU Healthcare 775NW, Jacquie Helt, Helena, MT

- Benefits union labor

Sister's Network of Central Virginia, Brenda Archer, President

- Benefits African American healthcare

Solano Economic Development Corporation, Michael S. Ammann, Fairfield, CA

- Good for job growth and business development

Songwriters Guild of America, Rick Carnes, President, Nashville, TN

- Benefits consumers

Sonoma Community Corporation, Juan M. Hernandez, Executive Director, Santa Rosa CA

- Benefits community development

Sonoma Valley Vintners, Maureen L. Cottingham, Executive Director, Sonoma, CA

- Benefits agribusiness

South Carolina Association of Community Development Corporations, Bernie Mazyck, Charleston, SC

- Benefits rural communities

South Carolina Department of Agriculture, Hugh Weathers, Commissioner, Columbia, SC

- Good for American farmers

South Carolina Department of Education, Mick Zais, Columbia, SC

- Benefits the educational system

South Dakota Chamber of Commerce, David Owen, President, Pierre, SD

- Benefits rural communities and good for business development and job stimulation

South Dakota Farmers Union, Doug Sombke, President, Huron, SD

- Benefits rural communities and good for business development and job stimulation

South Dakota State Federation of Labor AFL-CIO, Mark Anderson, President, Sioux Falls, SD

- Good for job stimulation and benefits T-Mobile USA workders

South Dakota Trucking Association, Myron L. Rau, President, Sioux Falls, SD

- Benefits truck drivers and the trucking industry

Southeast Missouri Area Agency on Aging, Glenda Hoffmeister, Director, Cape Girardeau, MO

- Benefits seniors

Southwest Economic Development Corporation, David B. Braddock, Altus, OK

- Benefits rural communities and good for business development

Southwest Louisiana Economic Development Alliance, George Swift, President, Lake Charles, LA

- Good for business development

Southwest Virginia Graduate Medical Education Consortium and Area Health Education, Susan Alford, Director, Lebanon, VA

- Benefits rural communities, in particular healthcare in rural communities

Spanish American Merchants Association, Julio Mendoza, Executive Director, Hartford, CT

- Benefits the Hispanic community

Speaker Pro Tempore Jamie Woodson, Tennessee State Senate, Nashville, TN

- Benefits rural communities and the educational system

Speaker of the House Beth Harwell, Tennessee House of Representatives, Nashville, TN

- Benefits the educational system and good for business development

Speaker of the House Robert Gilligan, Delaware House of Representatives, Dover, DE

- Benefits educational and healthcare systems

Speaker of the House Robert Nutting, Maine House of Representatives, Augusta, ME

- Benefits rural communities and good for job stimulation

Speaker of the House Robert S. Moore, Arkansas House of Representatives, Little Rock, AR

- Benefits small cities and towns and good for job stimulation

Springdale Chamber of Commerce, Perry Webb, President/CEO, Springdale, AR

- Good for competition and business development

St. Louis Regional Chamber and Growth Association, Richard C.D. Flemming, President, St. Louis, MO

- Good for economic development

St. Paul Area Chamber of Commerce, Matt Kramer, President, St. Paul, MN

- Good for business development and competition

State Chamber of Oklahoma, Fred Morgan, President and CEO, Oklahoma City, OK

- Good for small business development and job stimulation

State Representative Ann E. Mah, Kansas House of Representatives, District 53, Topeka, KS

- Good for rural communities

State Representative Brad Witt, Oregon House of Representatives, District 31, Salem, OR

- Good for small business development, union workforce and job stimulation

State Representative Calvin Smyre, Georgia House of Representatives, District 132, Atlanta, GA

- Benefits small and rural communities and minority communities

State Representative Chad Campbell, Minority Leader, Arizona House of Representatives, Phoenix, AZ

- Good for business development

State Representative Dan Kerschen, Kansas House of Representatives, Topeka, KS

- Benefits rural communities and good for job stimulation and protection

State Representative David A. Mack, South Carolina House of Representatives, Columbia, SC

- Benefits rural communities and particular minority communities

State Representative Jeff Dial, Arizona House of Representatives, District 20, Phoenix, Arizona

- Benefits rural communities

State Representative Jerry Henry, Kansas House of Representatives, District 63, Topeka, KS

- Benefits rural communities

State Representative John H. Rogers, Commonwealth of Massachusetts House of Representatives, Boston, MA

- Good for business development and job stimulation and benefits the educational system

State Representative Kate Brophy McGee, Arizona House of Representatives, District 11, Phoenix, AZ

- Good for business development

State Representative Mike Jackson, Oklahoma House of Representatives, District 40, Oklahoma City, OK

- Benefits rural communities

State Representative Mike Moyle, Majority Leader, Idaho House of Representatives, Boise, ID

- Benefits rural communities

State Representative Tobias Read, House Democratic Whip, Oregon House of Representatives, Salem, OR

- Good for economic development and growth

State Representative Will Infantine, New Hampshire House of Representatives, Concord, NH

- Good for economic and business development and benefits rural and small communities

State Representative William Wainwright, North Carolina House of Representatives, Raleigh, NC

- Good for competition and benefits minority communities

State Senator Bill Anderson, Iowa State Senate, Des Moines, IA

- Benefits rural communities

State Senator Michele Reagan, Arizona State Senate, Phoenix, AZ

- Good for job stimulation and small business development

State Senator Mike McGinness, Las Vegas, NV

- Benefits rural communities

State Senator Ron Richard, Missouri State Senate, Jefferson City, MO

- Good for economic growth

State Senator Ron Stollings, West Virginia State Senate, Charleston, WV

- Benefits rural communities

Stephen Higginbotham, Former Arkansas State Senator, Marianna, AR

- Benefits rural communities and beneficial during natural disasters and emergency situations

State Senator Ted Ferrioli, Oregon State Senate, District 30, Salem, OR

- Benefits rural communities and good for economic development and education

State Treasurer Walker Stapleton, Colorado Department of the Treasury, Denver, CO

- Good for business development and job stimulation

Staten Island Chamber of Commerce, Linda Baran, President and CEO, Staten Island, NY

- Good for business development and job stimulation

Statewide Hispanic Chamber of Commerce of New Jersey, Dr. Daniel H. Jara, President and CEO, Newark, NJ

- Benefits for Hispanic communities and businesses

Stay Connected AZ, Norma Parraz

- Benefits the Hispanic community and business development

Summit County Council, David Ure, Coalville, UT

- Benefits rural communities

Taxpayer Association of Oregon, Jason Williams, Tigard, OR

- Good for consumers and local business development

Teamsters Local 391, Jack Cipriani, Greensboro, NC

- Good for job stimulation

Teamsters Local 469, Fredrick Potter, Hazlet, NJ

- Good for business development and job stimulation

Teamsters Union Local 340, Kenneth L. Eaton, South Portland, ME

- Good for rural communities, job stimulation and business development

Teamsters Union Local No. 633, David Laughton, Manchester, NH

- Good for job stimulation

Technology Association of Iowa, Leann Jacobsen, Des Moines, IA

- Good for local business development

TELACU Millennium, David Lizarraga, Los Angeles CA

- Education-related benefits

Tennessee Center for Policy Research (TCPR), Justin Owen, Nashville, TN

- Good for broad broadband deployment; benefits consumers and economic development

Texas Border Association, Blas Castaneda, Austin, TX

- Benefits rural communities; good for job stimulation

Texas Consumer Association, Sandie Haverlah, Austin, TX

- Benefits consumers, rural communities and small businesses

Texas Organization of Rural and Community Hospitals, David Pearson, President, Austin, TX

- Benefits rural communities and health-care related services

Texas Rural Education Association, Don Rogers, Executive Director, Austin, TX

- Benefits rural communities and the educational system

Texas Silver Haired League, Pat Porter, Secretary, Cisco, TX

- Benefits rural communities and seniors

Texas Southern University, Carroll Robinson, Associate Professor, Houston, TX

- Benefits low-income and minority students; Benefits the educational system

The Alliance, Gary Chandler, Corinth, MS

- Good for consumers and local business development

The Hispanic Institute, Gus West, President, Washington, DC

- Benefits the Latino community

The Illinois Black Chamber of Commerce, Larry Ivory, President, Pretoria, IL

- Benefits African American small business development and job stimulation

The Literacy Council, Beth Wilder, Birmingham, AL

- Benefits rural communities and the educational system

The Oasis Institute, Marcia M. Kerz, St. Louis, MO

- Benefits rural communities and senior citizens

The Pilots Association for the Bay and River Delaware, James R. Roche, Philadelphia, PA

- Benefits economic development and recovery

The Poultry Federation, Marvin Childers, Little Rock, AR

- Benefits rural communities and business development; good for consumers

The Sisters Network of Mississippi, Norma Dewing, Tupelo, MS

- Benefits rural communities and access to healthcare services

The World Conference of Mayors, Inc., Johnny Ford, Founder, Tuskegee, AL

- Good for broad broadband deployment

Thomas Jefferson Institute for Public Policy, Michael W. Thompson, Chairman, Springfield, VA

- Benefits rural communities; good for consumers and competition

Tom Campion, Superb Meats, Tom Campion, St. Paul, MN

- Benefits rural and underserved communities; good for business sustainability

TraxEnergy, John Dobbins, Lawrence, KS

- Good for business sustainability

Tri-City Regional Chamber of Commerce, Colin Hastings, Vice-President, WA

- Good for business sustainability and development

Tri-County Regional Labor Council, AFL-CIO, Bill Crooks, Akron, OH

- Good for consumers and job stimulation

Tulumne County Economic Development Authority, Larry Cope, Director of Economic Development, Sonora, CA

- Good for business development

Tyler Investments, Lynda Tyler, Wichita, KS

- Good for consumers and local business development

Tyron Capital, Peter Reichard, Chapel Hill, NC

- Benefits rural communities; good for local job stimulation

UA Local 693 Plumbers and Pipefitters, Jeff Potvin, Burlington, VT

- Benefits rural communities; good for job stimulation and economic development

Union County Chamber of Commerce, Julie Graham, Maynardville, TN

- Benefits rural communities; good for local economic development

United Campus Workers-Communications Workers of America Local 3865, Thomas L. Anderson, President, Knoxville, TN

- Good for consumers, economic development and American work-force

United Food & Commercial Workers Local 400, Thomas P. McNutt, Charleston, WV

- Benefits rural communities; good for consumers and job stimulation

United Food and Commercial Workers (UFCW) Local 431, Jerry Messer, Davenport, IA

- Good for consumers and small businesses

United Food and Commercial Workers International (UFCW) Local 328, Jim Riley, Secretary, Providence, RI

- Benefits rural and underserved communities; good for American workforce

United Food and Commercial Workers International Union (UFCW) Local 655, David Cook, St. Louis, MO

- Benefits rural and underserved communities; good for American workforce

United Food and Commercial Workers Union (UFCW) Local 400, Thomas P. McNutt, Charleston, WV

- Benefits rural communities; good for consumers and American workforce

United Food and Commercial Workers Union (UFCW) Local 791, Peter Derouen, South Easton, MA

- Good for consumers and American workforce

United Food and Commercial Workers Union, Local 555, Jeff Anderson, Tigard, OR

- Good for job stimulation

United Way of Eastern Kentucky, Pamela Compton

- Benefits rural communities

United Way of Northwest Florida, Bryan Taylor, Panama City, FL

- Benefits rural communities

University of Arkansas for Medical Sciences - OB/GYN Dept., Curtis Lowery, M.D.,

- Benefits health care industry

University of North Dakota, Glenn Miller, Grand Forks, MN

- Benefits health care industry and education system

Upstate SC Alliance, Hal Johnson, Greenville, SC

- Good for business development

Upward Bound: East Stroudsburg University, East Stroudsburg, PA

- Benefits education system

Urban Corps of San Diego County, Sam Duran, CEO, San Diego, CA

- Good for job stimulation

US Chamber of Commerce, William L. Kovacs, Washington, DC

- Timely action by the FCC will result in investment and job creation

US Hispanic Chamber of Commerce, Javier Palomarez, Washington, DC

- Benefits Hispanic communities

US Hispanic Leadership Institute (USHLI), Dr. Juan Andrade, Chicago, IL

- Benefits Hispanic communities

Utah League of Cities and Towns, Kenneth H. Bullock

- Benefits rural communities

Utah Taxpayers Association, M. Royce Van Tassell

- Good for competition

Vantage Pointe Foundation, John Glassman, Lawrence, KS

- Benefits seniors

Ventura County Economic Development Association, Bill Buratto, Ventura, CA

- Good for business development

Viega LLC, Monty Betts, Wichita, KS

- Good for business development

Vietnamese American Chamber of Commerce, Tam Nguyen, Garden Grove, CA

- Good for business development

Virginia AFL-CIO, Phil Prange, President

- Good for labor

Virginia Asian Chamber of Commerce, Tinh Phan, Chairman

- Good for business development

Virginia Hispanic Chamber of Commerce, Michael Zajur, President

- Benefits Hispanic communities

VisionPerry, Michael Durmont, Linden, TN

- Good for business development

W3M Consortium, Jared L. Elkins, Palm Bay, FL

- Good for business development

Washington Communications Workers of America Local 7803, Jeanne Stewart, Renton, WA

- Good for labor

Washington Policy Center, Carl Gipson, Seattle, WA

- Good for broad broadband deployment

Wellington Area Chamber of Commerce, Shelley Hansel-Williams, CEO, Wellington, KS

- Benefits rural communities

West San Gabriel Valley YMCA, Valerie Gomez, San Gabriel, CA

- Benefits education system

Western Alliance for Economic Development, Lori Church, Wilder, ID

- Good for small business development

Western Governors University, Salt Lake City, UT

- Benefits education system

Wichita Hispanic Chamber of Commerce, Abel Perez, KS

- Benefits Hispanic communities

Wichita Pachyderm Club, John Todd, KS

- Good for business development

WIFE (Women Involved in Farm Economics), Deb Dressler, Richardton, ND

- Benefits rural communities

Wired Wisconsin, Thad Nation, Milwaukee, WI

- Benefits health care, education, and businesses

Wisconsin Business Council, Phil Prange, President

- Good for business development

Wisconsin Coalition for Consumer Choice, George Klaetsch, Executive Director

- Good for competition

Wisconsin Minority Supplier Development Council, Dr. Floyd Rose, Madison, WI

- Good for business development

World Trade Center of New Orleans, New Orleans, LA

- Good for business development

World Wide Technology, St. Louis, MO

- Good for small business development