

While the VZ/T-Mobile transaction does address concerns Public Knowledge has previously expressed with regard to the problem of spectrum concentration created by this transaction, it does nothing to address the issues relating to the Joint Operating Entity (JOE) and the joint marketing agreements (JMAs), which are intrinsically linked to the proposed license transfers at issue in proceeding (12-4). Interoperability rule is still a must.

If the JOE and JMAs were rescinded, however, and the Commission required Verizon Wireless to honor its commitment to sell its Lower 700 MHz A&B block licenses, the proposed set of transactions would result in an overall enhancement of spectrum efficiency for both Verizon Wireless and T-Mobile. Depending on the outcome of the Lower 700 MHz A&B block sales, the net result could potentially alleviate spectrum access issues among several regional providers.³ But even these benefits cannot offset the anti-competitive impact of the JOE and JMAs on the wireless industry and on the telecommunications industry as a whole.