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**Computer & Communications Industry Association**

February 12, 2013

*Via Electronic Filing*

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

Re: *Applications of Sprint Nextel Corporation, Transferor, and SOFTBANK CORP. and Starburst II, Inc., Transferees, for Consent to Transfer of Control of Licenses and Authorizations, IB Docket No. 12-343*

Dear Ms. Dortch:

The Computer & Communications Industry Association (“CCIA”) is a nonprofit membership organization composed of a wide range of companies in the computer, Internet, information technology, and telecommunications industry. CCIA’s member companies vary widely and include computer and communications companies, Internet platforms, equipment manufacturers, software developers, service providers, resellers, integrators, and financial service companies.

Created four decades ago, CCIA seeks to promote open markets, open systems, open networks, and full, fair, and open competition. Toward these ends, CCIA supports the transaction proposed between SOFTBANK CORP. (“SoftBank”) and Sprint Nextel Corporation (“Sprint”). This transaction will result in an investment of over \$20 billion in the U.S. wireless industry and help invigorate competition.

The Commission has recognized that permitting foreign entry and investment “promote[s] effective competition in the U.S. telecommunications services market by removing unnecessary regulation and barriers to entry that can stifle competition and deprive U.S. consumers of the benefits of lower prices, improved service quality, and service innovations.”<sup>1</sup> The limited number of commenters and petitioners who have raised

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<sup>1</sup> *Rules and Policies on Foreign Participation in the U.S. Telecommunications Market; Market Entry and Regulation of Foreign-Affiliated Entities*, Report and Order and Order on Reconsideration, 12 FCC Rcd 23891, ¶ 11 (1997), modified by Order on Reconsideration, 15 FCC Rcd 18158 (2000); see also *id.* ¶ 4 (“We expect that entry by foreign telecommunications carriers and other investors will increase competition in the U.S. telecommunications service market, providing lower prices and increased quality of service.”).

concerns about the proposed investment by a foreign company have raised no credible or cognizable claims. As the record in this proceeding demonstrates, SoftBank's investment will accelerate and expand wireless broadband deployment in the United States, to the benefit of consumers.<sup>2</sup>

In stark contrast to the transaction proposed by AT&T and Deutsche Telekom,<sup>3</sup> the transaction now before the Commission will promote competition by strengthening Sprint's ability to compete against the two dominant U.S. wireless carriers. In fact, this new investment in a second tier carrier is a healthy byproduct of the refusal of the FCC and the Justice Department to approve further industry consolidation at the top that would have eliminated T-Mobile. By strengthening competition in the U.S. wireless industry, the SoftBank/Sprint transaction will benefit American consumers, while spurring innovation and economic growth. CCIA urges the Commission to approve the proposed transaction expeditiously.

Sincerely,



Catherine R. Sloan  
Vice President, Government Relations

cc: Kathleen Collins  
David Krech  
Paul Murray  
Aaron Goldschmidt  
Christopher Sova  
Wayne McKee  
Neil Dellar

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<sup>2</sup> Applications of Sprint Nextel Corporation, Transferor, and SoftBank Corp., and Starburst II, Inc., Transferees, for Consent to Transfer of Control of Licenses and Authorizations, Public Interest Statement, IB Docket No. 12-343, at 13-29 (Nov. 15, 2012); Applications of Sprint Nextel Corporation, Transferor, and SoftBank Corp., and Starburst II, Inc., Transferees, for Consent to Transfer of Control of Licenses and Authorizations, Amendment, IB Docket No. 12-343, at 4-6 (Dec. 20, 2012).

<sup>3</sup> Bureau Staff Analysis and Findings, appended to Applications of AT&T Inc. and Deutsche Telekom AG, Order, 26 FCC Rcd 16184, WT Docket No. 11-65 (WTB 2011) ("Staff Report").