

June 21, 2013

VIA ELECTRONIC FILING

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

Re: *Applications of Sprint Nextel Corporation, Transferor, and SoftBank Corp., and Starburst II, Inc., Transferees, for Consent to Assign or Transfer Control of Licenses and Authorizations, and Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act, As Amended, IB Docket No. 12-343, File No. ISP-PDR-20121115-00007*

Dear Ms. Dortch:

MVNO Association files this letter in support of the June 19, 2013 letter from the Minority Media and Telecommunications Council (“MMTC”) about its continuing concerns with the SoftBank-Sprint transaction pending before the Commission, which have not yet been addressed.¹

Like MMTC, whether or not the Commission decides to issue a new Public Notice, as called for by DISH Network Corporation in its letter to the Commission last week,² MVNO Association urges the Commission to address its concerns about the ability of mobile virtual network operators (“MVNOs”) to continue providing affordable mobile wireless services to their minority, immigrant, rural, and low-income subscribers. MVNO Association has proposed that

¹ See Letter to Chairwoman Mignon Clyburn, Federal Communications Commission, from David Honig, President, MMTC, SoftBank-Sprint Acquisition, IB Docket No. 12-343 (filed June 19, 2013) (stressing that the “record in this proceeding remains devoid of any information about how the proposed transaction would impact women and minorities and increase broadband access for underserved communities”).

² See Letter to Marlene H. Dortch, Secretary, Federal Communication Commission, from Pantelis Michalopoulos, Counsel for DISH Network Corporation, IB Docket No. 12-343, Sprint Nextel Corp. and SoftBank Corp., Joint Application for Consent to Transfer International and Domestic Authority (filed June 12, 2013) (urging that the amended merger agreement “requires a revised application, a new Public Notice, and an updated public interest analysis”).

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the Commission impose a condition on any entity that acquires Sprint, such that the acquiring entity shall be required to offer its mobile wireless services for resale to MVNOs on commercially reasonable terms and conditions, either by continuing the existing resale agreements that MVNOs have with Sprint or by negotiating resale agreements for mobile wireless services on commercially reasonable terms and conditions that are reasonably similar to those currently in effect under the agreements that MVNOs already have with Sprint.

The public interest analysis of the SoftBank-Sprint transaction, or any acquisition of Sprint, should include consideration of the impact that any Sprint acquisition will have on the consumers served by MVNOs, taking appropriate steps to ensure that these consumers are not disadvantaged by any entity that acquires Sprint. Requiring an acquiring entity to honor Sprint's existing resale agreements and to continue offering resale agreements on terms and conditions that are similarly favorable to those offered by Sprint is in the public interest.

Please contact the undersigned should any questions arise concerning this filing.

Respectfully submitted,

/s/

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