



NATIONAL GRANGE

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American Values. Hometown Roots.

September 14, 2018

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

Re: WT DOCKET NUMBER 18-197
Written Ex Parte Communication

Dear Ms. Dortch:

The National Grange, the nation's oldest rural advocacy organization, is writing in response to the proposed merger of T-Mobile USA, Inc. ("T-Mobile") and Sprint Corporation ("Sprint"). The Grange is not taking a position on the proposed merger at this time, but we wanted to provide our views on the importance of the potential improvements in rural wireless service that T-Mobile and Sprint have promised.

Since 1867, the Grange has been a leader in the fight to bring prosperity and opportunity to farmers and rural Americans. When the Grange was founded, it often focused on the impact of then-new technologies such as railroads and the telegraph. Today, our issues range from protecting the livelihoods of farmers and ranchers through the most efficient agriculture legislation and regulation, to advocating for the build-out of affordable access to high-speed broadband in rural areas. We realize the importance of affordable, sustainable health care as well as making sure rural schools can provide the same quality education as urban districts, and work towards the delivery of those systems. The Grange was pleased to serve on the FCC's Broadband Deployment Advisory Commission, and recognizes the FCC's desire to ensure high quality, advanced services are available to rural America and our members. Indeed, as we have told the FCC in other proceedings, making broadband available to rural consumers and businesses is critical.¹

Despite the FCC's efforts over many years, rural deployment of broadband still lags behind the rest of the country. This is especially a concern for wireless broadband—about 14 million customers in rural areas do not have access to wireless broadband at speeds of 10 Mbps or more, and rural LTE deployment in rural areas essentially ended in 2014.

¹ For examples, see our February 21, 2018 letter on Lifeline issues in WC Docket Nos. 17-287, 11-42, and 09-197 and our August 30, 2018 letter to Commissioner Carr on the Connected Care Pilot Program in WC Docket No. 18-213.

One of the most encouraging aspects of the proposed T-Mobile/Sprint merger is that the companies plan not only to serve rural areas, but also to provide the type of quality, speed and in-building service that urban parts of the country have long taken for granted. According to the public interest statement submitted by T-Mobile and Sprint, the combined company will deliver mobile broadband service with download speeds of at least 10 Mbps or greater to 45.9 million rural residents who are spread across more than two million square miles. This deployment means that 74 percent of all rural residents would have access to a wireless broadband alternative. The applicants' public interest statement adds that the combined company intends to provide fixed in-home broadband service with a throughput of at least 25/3 Mbps to more than 52 million rural residents who are spread across nearly 2.5 million square miles – meaning some 84 percent of all rural residents would finally secure access to an in-home broadband alternative following the merger.

If the combined company succeeded in deploying these services, the merger would help usher in an enormous change in how wireless providers serve rural areas, and would materially benefit rural communities. The new services could help link schools and health care providers to resources that are hard to use today because of a lack of broadband access. A 25 Mbps in-home service would give students access to new learning tools, would enable many farmers to take advantage of precision agriculture products and services, and would open up new opportunities for rural businesses that today cannot take full advantage of the Internet. Together, these benefits would help change life in rural America for the better.

Furthermore, we note that the combined company plans to extend an offer to become the preferred roaming partner for rural carriers, providing long-term roaming access to its new network at industry-leading terms. New T-Mobile's roaming program also will allow carriers with existing roaming rates with either T-Mobile or Sprint to choose which rates will govern their relationship with the new company if the merger is approved. National Grange appreciates these promises and would expect New T-Mobile to work with rural providers to ensure they are kept in order to ensure seamless mobile broadband service to rural customers.

While the Grange has no position on the merger of T-Mobile and Sprint, we felt it important to share our view with the Commission that if the Commission concludes the combined company will deploy 5G broadband services where, how and when the Applicants say they will, the public interest benefits to rural communities would be significant.

Consistent with the requirements of the FCC's rules, we are submitting this letter to the Electronic Comment Filing System in the docket for this proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "Betsy E. Huber". The signature is written in black ink and is positioned above the printed name and title.

Betsy E. Huber
President