

Mr. Scott Scheele  
Chief, Telecommunication and Broadband Section  
Anti-Trust Division, U.S. Department of Justice  
450 Fifth Street NW, Suite 7000  
Washington, DC 20530

September 29, 2019

Dear Mr. Scheele,

I hope you will consider comments from our small rural enterprise, Vermont Telephone Co., Inc., in support of the T-Mobile-Sprint merger:

Attached please find a copy of a letter we sent June 15, 2018, to the U.S. Senate Sub-Committee on Antitrust, Competition Policy, and Consumer Rights, regarding a 2018 public hearing. This 2018 letter mentions VTel's collaboration with T-Mobile and Sprint to accelerate deployment of our 4G LTE wireless neutral roaming network, on approximately 150 Vermont sites, in the most remote regions of one of our nation's most rural states.

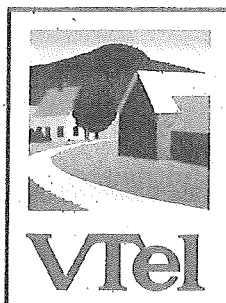
Some nine months after the attached 2018 letter was sent, a T-Mobile/Sprint May 20, 2019, agreement with the FCC was made public, with T-Mobile/Sprint committing almost \$40 billion for 5G US rollout. As you are no doubt aware, this includes deployment of 600 MHz wireless spectrum to reach some 90% of rural populations, and deployment of 2.5 GHz spectrum to reach some 66.7% of rural households, with speeds over 50 Meg.

If I might speak personally for a moment, it is my respectful opinion that every federal and state regulator, and legislator, from Hawaii and Alaska to Maine should be rushing to embrace this once-in-a-lifetime rural 5G build-out opportunity. At our small company, in an effort to bring the latest wireless technologies to rural Vermont, we have been working to deploy similar Ericsson 2.5 GHz radios. Early indications are that the results are dazzling, but the capital costs for smaller wireless companies like ours are extraordinarily high. For T-Mobile/Sprint to have committed to do this roll-out nationally, deploying almost \$40 billion, is breathtaking, and will cause competitors large and small to simultaneously increase their rural investments.

Rural America has so much to gain from this, and so much to lose if it does not go forward.

Yours truly,

Dr. Michel Guité  
Chairman and CEO



June 15, 2018

The Honorable Mike Lee  
Chairman  
Subcommittee on Antitrust, Competition Policy and Consumer Rights  
361A Russell Senate Office Building  
Washington, DC 20510

The Honorable Amy Klobuchar  
Ranking Member  
Subcommittee on Antitrust, Competition Policy and Consumer Rights  
302 Hart Senate Office Building  
Washington, DC 20510

Dear Chairman Lee & Ranking Member Klobuchar,

I understand from media reports that, on June 27, 2018, your Subcommittee will hold a hearing to explore the proposed merger of T-Mobile and Sprint. As a small wireless provider, serving a predominately rural state such as Vermont, I wanted to share VTel Wireless's views on the merger, and specifically, why we believe this proposed merger serves the interests of not only Vermonters but also all rural Americans. Accordingly, I respectfully request that you make our views part of the hearing record.

When VTel Wireless began its rural Vermont build in 2012, many warned of the risks of building a 100% 4G wireless network without having or simultaneously constructing costly, arguably obsolete, but almost ubiquitous 2G and 3G facilities. No one else had tried 100% 4G LTE. The aphorism "*fools rush in, where angels fear to tread*" was clearly afoot in Springfield, and we went forward.

We could not have completed this buildout or successfully deployed 100% 4G LTE without initiatives by T-Mobile and Sprint designed to help rural wireless companies like VTel Wireless. Sprint engineers worked with us intensely for the past two years, integrating R&D by Ericsson, Syniverse, Samsung, Apple, Sprint, and VTel Wireless, for 4G LTE data roaming. We also have agreements in place to begin network integration with T-Mobile to turn-up 100% 4G Voice over LTE roaming in the next few months.

From what I can see, most rural wireless carriers in America today, which traditionally have been dependent on 2G and 3G voice roaming revenues, are barely surviving. Some ten years ago, there were approximately 165 rural wireless independents in the United States. Today, approximately 95 remain.

The problem is that, as the largest nationwide mobile carriers have become more dominant, former rural wireless partners increasingly are seen as competitors, whose geographic areas should be overbuilt and roaming fees slashed. Thankfully, Sprint and T-Mobile have developed an opposite strategy, seeking to develop and maintain a collaborative partnership with rural independent wireless carriers.

In my view, a combined Sprint/T-Mobile would have a positive impact at the local Vermont level. With the accelerant of VTel Wireless' 100% 4G LTE network, and Sprint/T-Mobile's more urban facilities, Vermonters would enjoy faster mobile speeds and enhanced wireless service on a daily basis.

Additionally, a combined Sprint/T-Mobile would undoubtedly create a stronger, more innovative, deeply needed, powerful 4G/5G competitor in the U.S. It also would, I believe, help many or most of the remaining rural independent wireless operators like VTel Wireless to similarly become more innovative and competitive. Enabling other rural independent wireless carriers to migrate to 100% 4G LTE, while also providing a path forward to move to 5G, would seem good for everyone.

Sincerely,



Michel Guité  
Chairman and CEO

Cc: The Honorable Patrick Leahy