



February 5, 2021

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: *Application for Consent to Transfer Control of International Section 214 Authorization*, File No. ITC-T/C-20200930-00173

Dear Ms. Dortch:

On February 3, 2021, representatives of Verizon, TracFone, and América Móvil (“Applicants”) met via telephone with representatives of the International Bureau, the Wireless Telecommunications Bureau, the Office of Economics and Analytics, and the Office of General Counsel to discuss the Verizon-TracFone application to transfer an international Section 214 authorization (see Attachment for list of meeting attendees).

Applicants highlighted that this transaction will bring Verizon’s resources to value conscious consumers at a time when it has never been more important to focus on the needs of consumers. Verizon has not had a significant presence in the pre-paid segment, but with this transaction the combined Verizon/TracFone will be able to deliver more expansive device lineups, 5G and home internet offerings, and international roaming options than a standalone TracFone could offer.¹ And TracFone needs this boost to compete – TracFone has lost nearly 20 percent of its customers in recent years, and over 350,000 subscribers between 3Q19 and 3Q20 alone.² Meanwhile, the flanker brands of T-Mobile and AT&T – Metro and Cricket, respectively – continue to leverage their vertically integrated approaches to gain pre-paid, value conscious customers.³ A combined Verizon/TracFone will eliminate inefficiencies and compete

¹ See Application for Consent to Transfer Control of International Section 214 Authorization, IBFS File No. ITC-T/C-20200930-00173, 11-13 (filed Sept. 30, 2020) (“Application”).

² América Móvil Q3 2020 Quarterly Report, 26 (Oct. 20, 2020) <https://www.americamovil.com/investors/reports-and-filings/quarterly-results/default.aspx>.

³ Application at 4-5.

Ms. Marlene H. Dortch
February 5, 2021
Page 2

aggressively for value conscious consumers against their rival providers' flanker brands, with no harms to the mobile wireless marketplace.⁴

Under the Commission's international Section 214 rules, the International Bureau will take action on an application within 90 days of public notice – in this instance, by February 18 – absent questions of “extraordinary complexity.” 47 C.F.R. § 63.12(d). No such complexity exists here. The Application received no petitions to deny, the record has closed, and the Applicants have addressed any and all material concerns raised in comments.

Respectfully submitted,

/s/ Alejandro Cantú Jiménez

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/s/ William H. Johnson

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⁴ Application at 14-18.

Ms. Marlene H. Dortch
February 5, 2021
Page 3

ATTACHMENT

Attendees at the Feb. 3, 2021 meeting were:

Verizon

William Johnson
Gregory Romano
Tamara Preiss
Katharine Saunders
Adam Krinsky, Wilkinson Barker Knauer, LLP

TracFone and América Móvil

Mia Guizzetti Hayes, Willkie Farr & Gallagher LLP
Brenna Sparks, Willkie Farr & Gallagher LLP

Wireless Telecommunications Bureau

Joel Taubenblatt
Monica DeLong
Stacy Ferraro
Charles Mathias

International Bureau

Denise Coca
Kathleen Collins
Kim Cook

Office of Economics and Analytics

Nicholas Copeland
Pat DeGraba
Kate Matraves
Don Stockdale
Glenn Woroch
Aleks Yankelevich

Office of General Counsel

Jim Bird
Joel Rabinovitz