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March 1, 2021

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

**Re: *Application for Consent to Transfer Control of TracFone Wireless, Inc.,*
File No. ITC-T/C-20200930-00173**

Dear Ms. Dortch:

On February 25, 2021, the undersigned and Peter Adderton, founder of Boost Mobile and of Mobile X, a new mobile virtual network operator (“MVNO”) based on uniquely tailored service plans, met via video conference with Ethan Lucarelli, Acting Legal Advisor to Acting Chairwoman Rosenworcel, regarding the above-referenced proceeding.

Mr. Adderton, a long-time innovator in the MVNO marketplace, described building the Boost Mobile brand with a focus on serving low-income consumers. He also highlighted his continuing efforts to ensure that such consumers, particularly those facing credit challenges, have meaningful access to cost-effective mobile services.

To this end, Mr. Adderton raised concerns regarding the proposed acquisition of TracFone Wireless, Inc. (“TracFone”) by Verizon Communications Inc. (“Verizon”). In particular, he explained that the combination would exacerbate harms associated with increased concentration in the mobile marketplace. Verizon’s acquisition of TracFone would eliminate the largest independent MVNO, thereby undermining the segment’s ability to compete with—and exert downward pricing pressure on—the national facilities-based carriers. Mr. Adderton also warned of the transaction’s harms to consumers, especially including the millions of TracFone subscribers who currently rely on the AT&T or T-Mobile networks for service. Verizon has pledged to migrate some such customers to its own network, but it has acknowledged the likelihood of extraordinary churn (on the order of 50 percent), given the need for many such customers to purchase new handsets. In addition, T-Mobile’s decision to shut down the Sprint 3G network will further destabilize the MVNO marketplace and leave countless Boost Mobile subscribers without service. The upshot would be that many low-income and credit-challenged consumers likely would end up with increased costs and inferior service plans.

Accordingly, Mr. Adderton proposed that the Commission condition any approval of the proposed acquisition on Verizon's divestiture of TracFone subscribers who currently are served by third-party networks. Doing so would curb the potentially costly disruptions to these consumers by allowing them to remain on the AT&T or T-Mobile networks. Moreover, imposing such a condition would serve the public interest by allowing an independent MVNO to achieve the scale necessary to compete with the major facilities-based carriers and their affiliated prepaid brands.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

/s/ Matthew A. Brill

Matthew A. Brill
of LATHAM & WATKINS LLP

Counsel for Mobile X

cc: Ethan Lucarelli