

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
AT&T Inc. and Deutsche Telekom seek FCC)
consent to the transfer of control of the) WT Docket 11-65
licenses and authorizations held by T-Mobile)
USA, Inc. and its subsidiaries to AT&T Inc.)
)

PETITION TO DENY

REC Networks (“REC”), an unincorporated entity through its founder Michelle (Michi) Eyre is a long time proponent for the Low Power FM (LPFM) radio service from the original petitions for the service through today and into the future. Over the years, REC has also been involved in other issues involving a citizen’s access to the electromagnetic spectrum. REC has also always had a concern about broadband availability in rural and other underserved areas.

REC joins with many other media justice organizations, consumer groups and consumers nationwide by opposing the proposed transfer as captioned above.

REC feels that with the AT&T acquiring the T-Mobile infrastructure, it is creating a monopoly for wireless services using the Global System for Mobile (GSM 1900) protocol.

Users with single and dual band GSM handsets will no longer have the ability to “port” their existing service from one carrier to another carrier as only a single GSM carrier will exist.

This acquisition will also result in a lack of carrier choice for visitors from outside the United States as there will only be one GSM provider and therefore would have a captive market on foreign tourists and people doing business in the United States thus giving AT&T the ability to resort to “captive audience” rating of airtime without the fear of competition. This monopoly could also have an impact on resellers who provide Subscriber Identity Module (SIM) cards to customers to use either AT&T or T-Mobile services on a wholesale basis.

Going back to the mid-80s with the original Advanced Mobile Phone System (AMPS) analog cellular systems, there have always been at least two competing providers in a single mode. This transfer would result in a single carrier (AT&T) in a single mode (GSM) thus giving many customers no choice to change providers without being required to borne the expense of a new handset.

REC feels that the Commission should deny this application as it will remove the only competition for American users of GSM single mode handsets and will provide a captive audience environment for foreign visitors.

I certify under penalty of perjury, this information is correct to the best of my knowledge.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michelle Eyre". The signature is stylized and cursive.

Michelle (Michi) Eyre
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