



Hispanic Technology & Telecommunications Partnership

Advancing Access to Broadband Technologies for Unserved and Underserved Communities

HTTP Members

Alianza Dominicana

ASPIRA Association

Association for the Advancement of Mexican Americans

Cuban American National Council

Dialogue on Diversity

Hispanic Federation

Hispanic Information Television Network

Interamerican College of Physicians and Surgeons

Labor Council for Latin American Advancement

Latinos in Information Sciences and Technology Association

MANA, A National Latina Organization

National Association of Hispanic Publications

National Conference of Puerto Rican Women

National Hispanic Council on Aging

National Hispanic Medical Association

National Puerto Rican Coalition

The Hispanic Institute

U.S.-Mexico Chamber of Commerce

U.S. Hispanic Chamber of Commerce

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Executive Director

May 31, 2011

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket No. 11-65

Dear Commissioners:

The Hispanic Technology and Telecommunications Partnership (HTTP) is a coalition of national Hispanic organizations working to increase awareness of the impact of technology and telecommunications policy on the U.S. Hispanic community.

HTTP members are nonprofit organizations that support the social, political, and economic advancement of 51 million Americans of Hispanic descent in the mainland and Puerto Rico, by facilitating access to health care, quality education, economic opportunity, technology tools, and resources. In its 12 year history, HTTP has emerged as the leading Hispanic voice on telecommunications and technology policy issues, especially surrounding the digital divide and telecommunications reform.

Our members and leading community advocates who represent a broad and diverse spectrum of community interest across the country are supporting the proposed AT&T/T-Mobile merger given its public interest benefits. From small business owners to labor activists, Latino state legislators to Latino doctors, academics and educators to journalists and publishers, civil rights advocates to Latino engineers, Members of Congress and a former FCC Commissioner to rural advocates and Governors representing states with a growing number of Latinos, it is clear this acquisition stands to benefit millions of Latinos across the country.

In fact, one of the most respected and knowledgeable voices on telecommunications policy, The Honorable Henry Rivera, former FCC Commissioner — the first Latino Commissioner in the agency’s history — wrote, “Given that minority communities rely on wireless services as their primary means for Internet access, the merger should offer these communities greater accessibility to reliable services.” Policymakers, therefore, “shouldn’t miss an opportunity to provide solutions that could help ensure more minorities have access to better service.”

The leading Latino advocacy organizations representing millions of Latinos through membership, councils, affiliates and service providers, agree that this

merger would be game-changing for the Hispanic community in driving ubiquitous deployment and universal adoption of high speed wireless broadband and spurring domestic investment necessary for continued job growth. It will also deliver the power of broadband to small businesses across the country, enabling these engines of economic growth and job creation in all parts of the country to expand their reach. In addition, this merger represents the biggest opportunity for Latino workers to come under the umbrella of the largest unionized workforce in the country.

The Hispanic Federation, National Hispanic Medical Association (NHMA), National Hispanic Council on Aging (NHCoA), League of United Latin American Citizens (LULAC), US Mexico Chamber of Commerce, ASPIRA, National Hispanic Caucus of State Legislators (NHCSL), the Labor Council for Latin American Advancement (LCLAA), the United States Hispanic Leadership Institute (USHLI), the National Puerto Rican Coalition, Inc. (NPRC), the US Hispanic Chamber of Commerce (USHCC), the Hispanic Institute, CNC (Formerly Cuban American National Council), Latinos in Information Sciences and Technology Association (LISTA), SER Jobs for Progress National, Inc., The Latino Coalition, The National Conference of Puerto Rican Women, and the Hispanic Leadership Fund among others, recognize the robust public interest benefits and the unique opportunity to enhance Latino empowerment in the country. In addition, this merger will accelerate the deployment of 4G LTE technology across the country, in utilizing scarce spectrum most efficiently even while we await the necessary spectrum reallocation, and in helping to close the digital divide.

Many Latinos have been early adopters of mobile technology and use it every day in their work, in education, and in communicating with family and friends. Yet the country still needs a catalyst to spur greater adoption of broadband, which is the prerequisite to fulfill the ambitious goals of the National Broadband Plan. Latino leaders view the AT&T-T-Mobile merger as a furtherance of those goals.

The merger's transformative power is summed up in the commitment to bring 4G technology to over 97% of Americans, including both urban and rural areas with large concentrations of Hispanics. This new ability to connect at high speeds helps to equalize opportunities. Many people will have a new opportunity to leap a generation or more of technology to move to 4G and discover applications that can enrich all aspects of their lives.

While we understand that there are some voicing opposition or concerns, we would urge you to consider the perspective of one of the Latino community's leading voices Dr. Juan Andrade, President & CEO of the US Hispanic Leadership Institute and one of only two Latino recipients in history of a Presidential Medal, as filed with the FCC, "I am writing in support of the proposed merger of AT&T and T-Mobile. Like you, I too have heard that the merger will have a devastating impact on consumers, promote anti-competitive behavior, and result in higher prices; that the merger will be bad for business, bad for innovation and bad for workers. We've heard this all before - when SBC was acquiring Ameritech, when AT&T was merging with SBC, and so forth. And what have we seen? We've seen just the opposite. The Federal Communications Commission's own data show that these concerns proved unfounded as consumers benefited from tremendous innovation and competition in the wireless space, all while seeing wireless voice and data prices drop."

While the FCC will consider all sides, if history and the facts are any indication, it is clear to us that the proposed transaction will serve the public interest.

Beyond the aforementioned benefits, we recognize AT&T's leadership in diversity best practices. As Janet Murguia, President & CEO of the National Council of La Raza stated, "AT&T and its predecessor companies have been pioneers in this field when it comes to the Hispanic community. Their relationship with the community dates back decades. It is therefore not surprising that AT&T has one of the most diverse and representative workforces in the industry, including at the highest levels of the company. In addition, we note that according to the National Minority Supplier Development

Council, AT&T has one of the strongest minority procurement records of any company, regardless of industry. It is little wonder then that Hispanic Business, DiversityInc, and other magazines have bestowed numerous "best of" awards on AT&T in recent years" she continues, "as the FCC and the Department of Justice move forward in this process, we hope and expect that improving diversity will be a cornerstone of whatever they ultimately decide".

Further, we applaud AT&T's commitment to continue its leadership position in corporate social responsibility, and enhance their existing commitments to adoption and supplier diversity through additional programs and partnerships.

On behalf of millions of Latinos represented by the leading national Hispanic organizations who have expressed their support for the AT&T/T-Mobile merger, I urge you to take the community's collective voice of support for this transaction into consideration as you review the merger and help to realize the nation's goal of universal broadband.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Llorenz". The signature is fluid and cursive, with a long horizontal stroke at the end.

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How wireless policy affects minorities

By: [Henry M. Rivera](#)

May 26, 2011 04:41 AM EDT

Spectrum fuels the wireless industry and the prospect of not being able to obtain enough of this finite resource should worry us. As a nation, we are at a critical crossroads — where choosing the wrong path threatens the livelihood of our ever-expanding community of wireless users.

In coming months, our policymakers' course of action is likely to affect the U.S. digital future. These airwaves are worth billions to wireless companies and are vital to the success and sustainability of the wireless industry and all consumer technologies it offers. Think of spectrum as the lifeblood of wireless technology.

Given the explosion in wireless consumer demand for smartphones and other devices that depend on spectrum, wireless providers need more spectrum if consumers want to continue to stream videos, pay bills and get access to a range of services on their wireless devices.

Cisco estimates that 50 billion devices will be connected to the nation's wireless network by 2020, as smartphones gain in popularity, and more and more everyday items are mobilized for consumer ease and efficiency.

The 2010 census showed that minority populations, Latinos in particular, are growing rapidly. Pair this with the fact that a high percentage of minorities depend on wireless service for Internet access, and the picture is clear: Consumer demand for wireless services will only grow.

Latinos and African-Americans lead the way in mobile broadband use — subscribing at a rate of 53 percent and 58 percent, respectively, and both groups will be disproportionately affected if providers fail to keep up with the demand for more spectrum.

This need is not some myth created by the wireless industry to justify amassing valuable spectrum, and its ramifications go well beyond the Beltway. The Federal Communications Commission has persuasively laid out the spectrum crunch facing the nation. Numerous companies, network engineers, wireless experts, analysts and even the White House have all testified about the threats associated with the looming problem — consistently presenting solid information supporting the detrimental effects of not having enough spectrum.

Only an extremely small faction of naysayers questions the realities of the crunch.

The FCC, Congress and industry stakeholders have been trying to reach consensus solutions so that this crucial resource is more effectively and efficiently utilized by spectrum holders. As FCC Chairman Julius Genachowski said last month, "We can't afford to wait to allocate more spectrum."

The wireless industry is also looking into market-based solutions. AT&T's recently announced merger with T-Mobile is one example. The near future means a fully connected world, and to get there, both long and short-term solutions need to be considered.

AT&T told the FCC that, if the merger is approved, the company will deploy next-generation 4G Long Term Evolution wireless networks — lightning-fast mobile Internet speeds comparable to wired broadband in the home — to more than 97 percent of Americans. AT&T said it can provide higher-quality and faster service while also closing coverage gaps. Given that minority communities rely on wireless services as their primary means for Internet access, the merger should offer these communities greater accessibility to reliable services.

AT&T also predicts that the merger can create opportunities and benefits for minorities across important sectors, including health care, education and the growth of small and minority-owned businesses — where

Latinos are leading the way.

When considering market-based solutions like the merger, or other alternatives for securing adequate spectrum availability, policymakers need to consider the effects carefully. But they shouldn't miss an opportunity to provide solutions that could help ensure more minorities have access to better service.

All communities can gain from a healthy wireless industry that will offer widespread options to the best technologies, create jobs through infrastructure upgrades, increase construction and deployment projects and foster online business opportunities — while allowing everyone to participate in a digitally connected society.

Henry M. Rivera served as the first Latino commissioner on the FCC. He now serves as chairman of the Minority Media and Telecommunications Council and chairman of the FCC's Advisory Committee on Diversity in the Digital Age. He is also a partner at Wiley Rein.



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