



NAACP Maryland State Conference
P.O. Box 9702
Arnold, Maryland 21012

March 8, 2012

March 6, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Application of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC For Consent To Assign Licenses; Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI Wireless, LLC, WT Docket No. 12-4

Dear Ms. Dortch:

On behalf of the Maryland State Conference of the National Association for the Advancement of Colored People (NAACP), I am writing to express our concern over Verizon Wireless' joint marketing and spectrum acquisition agreement with cable companies.

The Maryland State NAACP's objectives include ensuring the political, educational, social, and economic equality of all citizens. This anticipated merger where Verizon Wireless and the major cable companies (Comcast, Time Warner, Bright House Networks and, in a separate deal, Cox) will jointly market each other's products could detract from this effort. I understand that Verizon Wireless and the cable companies will offer a "quadruple play:" wireless service, broadband, video content ("cable TV"), and telephone service and Verizon Wireless will also purchase \$3.9 billion worth of wireless spectrum from Comcast, Time Warner, and Bright House Networks.

Economic equality for all citizens demands opportunity and stable pricing. By approving this merger without certain conditions potentially compromises advancement in our pursuit for economic parity in the following ways:

- This deal could easily increase prices and lower services for consumers by reversing the long-time rivalry between cable and telephone companies and creating an alliance with overwhelming market power to stifle competition. Additionally, such a merger is a contrary to the purpose of the Telecommunications Act of 1996, which intends to generate competition for the benefit of consumers with lower prices, better service and innovation.
- Additionally, in Baltimore where there is a significant African American population, the merger will create an incentive for Verizon not to compete against its new

cable partners. And, as a result, Verizon will not build out FiOS into Baltimore or other areas. High-speed fiber optic networks are vital for economic competitiveness. High-speed, fiber-optic networks are vital for economic competitiveness. Currently, Verizon's FiOS is the only all fiber-optic commercially-available network for businesses and households. Other advanced industrialized nations have already deployed fiber-optic networks on a large-scale; they recognize that high-speed fiber is the competitive infrastructure of the 21st century. Much of the suburban areas outside of Baltimore already have FiOS. The City of Baltimore will never get a fiber-optic network if this deal is approved, which concerns me greatly

- Under this transaction, as mentioned, Baltimore will never get a fiber-optic network and the City will be at a disadvantage. The direct job loss will be the hundreds of technicians that would be employed building, installing and maintaining FiOS in the area. The indirect costs of this deal are even higher: the lack of competition in telecommunications will raise prices and reduce service quality. If Baltimore is never wired for fiber-optic service, the City's residents and businesses will not be able to use applications that require truly high-speed internet, reducing job creation, educational opportunity, and participation in civic life. While the precise impact on jobs is difficult to predict, broadband investment leads to job creation. Lack of investment will leave the Baltimore less able to develop economically.

- The Verizon Wireless/Comcast/Time Warner/Cox behemoth will use its market power and quadruple play to destroy competitors. Since wireless, cable, internet and internet-telephone prices are unregulated, prices and service quality will be subject to the desires of an unregulated monopoly by these telecommunication giants. The quadruple play services are not luxuries; in the 21st century, they are essential services. Yet without any competition, the Verizon/Time Warner/Comcast quasi-monopoly will extract high economic rents by forcing up prices and reducing service quality.

I hope that the Federal Communications Commission will require conditions to improve this proposal before approving such a transaction. I respectfully request that the FCC consider requiring FiOS build out in the City of Baltimore and other urban environments along with other pro-competitive conditions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elbridge James".

Elbridge James