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October 1, 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, GN Docket No. 21-112**

Dear Ms. Dortch:

The Multicultural Media, Telecom and Internet Council (“MMTC”), along with the undersigned national intergovernmental and business advocacy organizations, support the transfer of control of TracFone Wireless, Inc. to Verizon Communications Inc.

As premier organizations dedicated to serving the interests and needs of millions of voices across the country, we have long advocated for efforts to bridge the digital divide. Many low-income consumers and communities of color rely on pre-paid phone service for broadband and have an urgent need for affordable and reliable broadband connectivity. Many Black and Brown small business owners rely on these consumers for their businesses to continue to survive. This makes the issue particularly critical amid the pandemic where broadband is essential to access vital online services and participate in the digital economy.

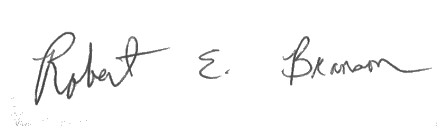
MMTC normally does not weigh in on this type of transaction. However, the need to maintain competition and customer choices in this market to benefit the communities we serve convinces us of the need to take a stance. We believe that TracFone, with access to Verizon’s network, will enhance the quality of service, service plans, and product availability for low income customers. TracFone customers will have the flexibility and low cost of a pre-paid plan, with more choices, better service, and new features. The transaction also will foster competition in the pre-paid market. TracFone will offer promotions and competitive pricing to earn the business of low-income consumers.

We understand that there were previous objections, some of which have been withdrawn, related to concerns surrounding the Lifeline program.¹ Verizon has made commitments to Lifeline customers to address those concerns.² Existing Lifeline consumers using TracFone will be able to keep their current plans and pricing, and Lifeline customers with devices that are not compatible with the Verizon network will receive free new devices

Fostering diversity, equity, and inclusion is critical to each of the undersigned organizations and is at the forefront of our missions. We are pleased to see Verizon's further commitment that TracFone employees that join Verizon will be covered by Verizon's diversity, equity, and inclusion programs, policies, and practices.³

The undersigned organizations urge the Commission to approve the transfer of control as soon as possible. The benefits to low income consumers should not be delayed any further.

Respectfully,

A handwritten signature in black ink that reads "Robert E. Branson". The signature is written in a cursive style with a vertical line at the end.

Robert Branson, President and CEO
Multicultural Media, Telecom and Internet Council

Representative Billy Mitchell, President
National Black Caucus of State Legislators

Representative Karen Camper, President
National Organization of Black Elected Legislative Women

Ron Busby, President and CEO
US Black Chambers, Inc.

Reverend Jesse Jackson, Sr., Founder and President
Rainbow PUSH Coalition

¹ See Ltr. from Public Knowledge, Access Humboldt, the Benton Institute for Broadband and Society, the California Center for Rural Policy, and Communications Workers of America, Dkt. 21-112 (Aug. 10, 2021).

² Ltr. from W. Johnson to M. Dortch, Dkt. 21-112 (Aug. 11, 2021).

³ Ltr. from W. Johnson to M. Dortch, Dkt. 21-112 (Sept. 22, 2021).