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Before the  
FCC MAIL ROOM Federal Communications Commission  
Washington, DC

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In the Matter of )  
Voicestream Wireless Corporation, )  
Powertel, Inc. and Deutsche Telekom AG )  
Request for Consent to Transfer Control )  
of Licenses and Authorizations )  
and Request for Declaratory Ruling )  
Allowing Indirect Foreign Ownership )

IB Docket No. 00-187 )

Introduction

The National Consumers League supports the applicants in the above-entitled matter because we believe that both consumers and workers will benefit without any detriment to our national security. NCL is a private, nonprofit consumer advocacy organization founded in 1899 to identify, protect, represent, and advance the economic and social interests of consumers and workers.

Global Nature of Telecommunications Market

The telecommunications marketplace is increasingly global. All major U.S. telecommunications companies have operations abroad. Foreign firms have already acquired large U.S. communications companies. For example, AirTouch was acquired by U.K.-based Vodafone; Telemex, which was previously government-owned, acquired Comm South Companies based in Texas and Topp Telecom, Inc. in Miami; and Deutsche Telekom and France Telecom have long-owned 20 percent of Sprint Corporation.

Benefits to Consumers and Workers

Consumers benefit from telecommunications companies that provide high levels of service that are accessible and reasonably priced. Deutsche Telekom has a reputation as a model company that serves consumers well and fairly. It is also a good corporate citizen, spearheading a program in Germany to provide educational institutions with Internet access and committing itself to making new technology available to everyone.

As an employer, the company enjoys positive relationship with the union that represents its workers and provides good working conditions and wages. Workers have a strong voice in the company through their participation in the supervisory board that appoints members of the corporate managing board and monitors its activities.

Adequate Safeguards are in Place

The Department of Justice and Federal Bureau of Investigation are required to review the purchase of U.S. telecommunications companies by foreign entities to ensure that our national security is not threatened. In addition, the U.S. Committee on Foreign Investment is required to conduct a separate national security review when foreign companies acquire domestic firms.

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Moreover, German law guards against the sort of cross-subsidization by government entities that might create an unfair advantage in the competitive communications market, and the European Union treaty also has strong antitrust enforcement mechanisms.

Conclusion

Assuming that the Federal Communications Commission finds that no risk to competition or the public interest, the application in the above-cited matter should be approved. Consumers and workers will benefit from a company that serves as an excellent model for other communications firms to follow.

Respectfully submitted,

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