



March 11, 2026

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

*Re: Assignment Applications Filed By AT&T Mobility II LLC and EchoStar Corp., WT Docket No. 25-303; Applications of Spectrum Business Trust 2025-1, Space Exploration Technologies Corp., and EchoStar Corporation for Consent to Assign Spectrum and Earth Station Licenses, WT Docket No. 25-302.*

Dear Ms. Dortch:

On behalf of The Bull Moose Project, I respectfully submit these comments regarding the proposed spectrum license assignments involving EchoStar Corporation and its subsidiaries.

We are a 501(c)(4) organization dedicated to advancing policies that promote American strength, economic dynamism, and the flourishing of American workers and communities. We have previously engaged the Federal Communications Commission (“Commission” or “FCC”) on issues relating to 5G and GPS / PNT policy, competition policy, and national security.

We generally support policies that ensure valuable spectrum resources are put to productive use for the benefit of the American people. For that reason, we do not oppose the underlying transactions contemplated in these proceedings. The productive deployment of spectrum resources and the continued expansion of America’s wireless infrastructure are important public-interest goals. Spectrum is a finite public resource and ensuring that it is deployed efficiently and effectively is a core responsibility of the Commission.

However, approval of these transactions should not allow a company to evade financial obligations to the American workers and businesses that built the network infrastructure associated with those licenses.

Put simply, the companies and workers who climbed the towers, installed the equipment, and built DISH’s network deserve to be paid.

Recent filings in these proceedings indicate that DISH Wireless — an EchoStar subsidiary — has refused to honor payment obligations to tower companies, infrastructure providers, and contractors, asserting that actions taken by the Commission constitute a “force majeure” event excusing its contractual commitments. At the same time, EchoStar seeks approval for spectrum transactions collectively valued at approximately \$40 billion.

If these transactions proceed without safeguards, the result could be a situation in which a company receives tens of billions of dollars from the sale of public spectrum while leaving the workers and businesses that helped create that value unpaid.

That outcome would have consequences far beyond the parties directly involved in these disputes. The wireless construction ecosystem depends on trust that contractual commitments will be honored. Infrastructure providers must invest capital, labor, and specialized expertise in network buildouts that often take years to complete. Contractors and infrastructure providers cannot responsibly commit resources to future buildouts if there is a credible risk that companies will later attempt to avoid payment through corporate restructuring or license transfers.

For example, the Communications Infrastructure Contractors Association filed January 6, 2026 in both dockets<sup>1</sup>. NATE does not oppose the transactions but warns that if contractors and tower owners bear the costs of EchoStar's exit, it will deter future participation in similar buildout efforts. This sentiment was reflected by a group of 25 small to mid-sized infrastructure providers, who filed jointly to request conditional approval upon EchoStar honoring its contractual obligations.<sup>2</sup>

The consequences of DISH's refusal to pay its obligations have extended directly to the workforce. One major tower company has announced a restructuring that includes cutting approximately 20 percent of its workforce—roughly 1,250 employees—with the company specifically citing DISH's contractual default as a factor accelerating the layoffs.<sup>3</sup>

President Donald J. Trump has made supporting infrastructure builders and American workers—particularly those in skilled trades—a central component of his economic agenda. Since taking office in 2025, the Administration has emphasized strengthening domestic industry, expanding apprenticeship opportunities, and ensuring that economic growth benefits American workers across sectors.

The telecommunications construction workforce plays a critical role in this broader effort. Tower climbers, fiber technicians, and communications infrastructure contractors perform physically demanding and often dangerous work that is essential to building and maintaining modern wireless networks. These workers enable the expansion of 5G infrastructure, support emergency communications systems, and help ensure that communities across the country remain connected.

Over the past decade, industry groups and policymakers alike have recognized the importance of strengthening the pipeline of skilled telecommunications workers. Community colleges, training programs, and apprenticeship initiatives have worked to recruit and train individuals for

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<sup>1</sup> <https://www.fcc.gov/ecfs/document/101062757624024/1>

<sup>2</sup> <https://www.fcc.gov/ecfs/document/121921567926/1>

<sup>3</sup> [Dish Default Causing Crown Castle to Accelerate Layoffs](#)

tower construction and related trades. In many cases, these initiatives have been supported by public workforce programs designed to expand opportunities in skilled labor. As recently as last April, President Trump signed an executive order to streamline and reform programs meant to promote skilled trades for American workers, which specifically targets the construction workforce shortage; the same skilled trades that built DISH's network.<sup>4</sup>

The Commission under Chairman Brendan Carr has demonstrated a strong commitment to the deployment of wireless infrastructure and protecting telecommunications workers and contractors during the review of major communications transactions.

The FCC's own 2025 year-end summary highlights that through merger approvals, the Commission "secured valuable commitments by all three major U.S. wireless carriers—Verizon, T-Mobile, and AT&T—to America's tower and telecom crews, including faster payment cycles and fairer pricing metrics."<sup>5</sup> Consistent with these actions, the Commission should not allow EchoStar to receive a \$40 billion windfall while walking away from its obligations to the companies and workers that built DISH Wireless.

The Communications Act requires the Commission to approve license transfers only if it determines that the transaction will serve the "public interest, convenience, and necessity." In exercising that authority, the Commission routinely imposes conditions designed to ensure that license assignments produce public-interest benefits and do not result in public-interest harms.

For that reason, we respectfully request that the FCC condition approval of the EchoStar-AT&T (Docket 25-303) and EchoStar- SpaceX (Docket 25-302) spectrum transfers on EchoStar establishing an escrow from transaction proceeds sufficient to cover outstanding obligations to their infrastructure partners.

The Commission would not be determining the outcome of individual disputes; rather, it would simply be ensuring that resources remain available for those disputes to be resolved through appropriate legal channels.

EchoStar itself has cited Commission actions as justification for refusing to pay certain obligations. If the Commission's proceedings are being invoked as the basis for denying fair compensation to American workers and businesses, we believe the Commission has a strong interest in ensuring that its actions do not facilitate those outcomes.

Respectfully submitted,

Aiden Buzzetti  
President  
Bull Moose Project

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<sup>4</sup> [Preparing Americans for High-Paying Skilled Trade Jobs of the Future – The White House](#)

<sup>5</sup> <https://www.fcc.gov/chairman-carr-highlights-wins-delivered-2025>