



Competitive Carriers Association
Rural • Regional • Nationwide®



April 23, 2014

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EX PARTE NOTICE

GN Docket No. 12-268: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*

WT Docket No. 12-269: *Policies Regarding Mobile Spectrum Holdings*

Dear Ms. Dortch:

On April 21, 2014, the below list of competitive carrier and trade association representatives (“competitive carrier representatives”) met with Chairman Wheeler, Ruth Milkman, Renee Gregory, Gary Epstein, Roger Sherman, Howard Symons, Edward Smith, Julie Knapp, Jim Schlichting, John Leibovitz and Diane Cornell to discuss elements of the FCC’s Mobile Spectrum Holdings proceeding and related incentive auction policies.

Steven Berry, CCA
Rebecca Murphy Thompson, CCA
Ben Moncrief, C Spire Wireless
Jeff Blum, DISH Network
Alison Minea, DISH Network
Shirley Bloomfield, NTCA – The Rural Broadband Association
Jill Canfield, NTCA – The Rural Broadband Association
Brian O’Neil, NTELOS
Tara Shostek, Rural Wireless Association, Inc.
Erin Fitzgerald, Rural Wireless Association, Inc.
Larry Krevor, Sprint
Richard Engelman, Sprint
Kathleen Ham, T-Mobile
Steve Sharkey, T-Mobile
Grant Spellmeyer, US Cellular

The competitive carrier representatives thanked the Chairman and his staff for crafting a transparent auction framework that appropriately balances one-time revenue objectives and the long-term benefits of robust competition. Competitive carriers are excited about the opportunity to participate in the upcoming incentive auction. The proposed incentive auction framework rightfully

acknowledges the economic and competitive benefits of low-frequency spectrum as critical for providing improved coverage both in urban centers and in rural areas. With more than 100 competitive carriers working to deploy advanced services like LTE and LTE Advanced throughout America, the competitive carrier representatives believe that the Commission's proposed framework will improve opportunities for competitive providers to bid on and win much-needed low-band 600 MHz spectrum. It is critical that smaller carriers and carriers that currently have little or no access to low-band spectrum become part of the 600 MHz ecosystem. This will provide new consumer services and bring economies of scale to every competitive carrier. As a result, the Commission's proposed framework will lead to greater auction revenue, which means more money in the hands of broadcasters who voluntarily sell their spectrum.

Building on this proposed framework, the competitive carrier representatives made suggestions on several interrelated issues to further increase revenues, promote competition to the wireless market, and encourage broader and faster LTE deployments—particularly in rural areas.

Competitive carrier representatives encouraged the Commission to account for the effects of national market power during the auction, as the Department of Justice recommended, by adopting a national eligibility requirement for reserved spectrum in addition to a local eligibility requirement. A dual eligibility requirement would more accurately reflect market power while still allowing AT&T and Verizon to bid on reserve blocks of spectrum in areas where they do not hold excessive low-band spectrum. Similarly, competition would be enhanced if the Commission reserved more licenses for competitive access by allocating an odd number of unreserved licenses, which would force the largest carriers to compete with each other and increase the likelihood of generating more revenue in both the reserved and unreserved blocks. Finally, competitive carrier representatives asked the Commission to continue to recognize the varying utility of different types of spectrum and account for this differing utility in its transaction screen.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

*/s/ Rebecca Murphy Thompson**

Rebecca Murphy Thompson
Competitive Carriers Association

/s/ Jill Canfield

Jill Canfield
NTCA – The Rural Broadband Association

/s/ Tara Shostek

Tara B. Shostek
Rural Wireless Association, Inc.

* Competitive Carriers Association signs on behalf of itself, its members in attendance at this meeting, and its more than 100 competitive carrier members.

cc (via email): Chairman Tom Wheeler
Ruth Milkman
Diane Cornell
Renee Gregory
Gary Epstein
Howard Symons
Edward Smith
Julie Knapp
Roger Sherman
Jim Schlichting
John Leibovitz