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*Admitted only in District of Columbia

March 11, 2019

Via ECFS
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation
Applications of T-Mobile US, Inc. and Sprint Corporation for
Consent to Transfer Control of Licenses and Authorizations
WT Docket No. 18-197**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. Section 1.1206(b), notice is hereby provided of an oral *ex parte* presentation in the above-referenced proceeding. On March 7, 2019, John Schwartz, Chief Executive of Voqal; Alan Hill, President of the J.A. Hill Group; and undersigned counsel (together the "Participants"), met with members of the FCC Transaction Team identified in Attachment A to discuss and answer questions regarding the confidential written *ex parte* presentation Voqal filed on March 4, 2019.¹ In particular, the Participants discussed Voqal's "Top Half" divestiture proposal should the Commission determine to approve the proposed T-Mobile/Sprint merger.

Voqal's Top Half divestiture proposal is a refinement of divestiture options that Voqal set forth in its "Petition to Deny the Above-Captioned Applications as Currently Proposed of Voqal" filed August 27, 2018. The participants explained why Top Half divestiture is the simplest, least disruptive and most practical divestiture remedy, involving Broadband Radio Service (BRS) and Educational Broadband Service (EBS) G Group spectrum. It also addresses important concerns that other EBS licensees raised regarding possible divestiture, including that no EBS licensees would be forced to alter their current leasing or service arrangements if they prefer not to do so. Mr. Schwartz also indicated that both Top Half and Bottom half divestiture would lessen the buyer

¹ Voqal filed its confidential written presentation with the Secretary's office on March 4. A redacted copy of the presentation also was filed via ECFS on March 4. On March 5 counsel learned of an issue with the March 4 redacted filing that made it possible to view the confidential information. The Commission's staff made the March 4 redacted ECFS filing a confidential document unavailable for public viewing and Voqal resubmitted a fully redacted copy of the presentation via ECFS on March 5.

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market power New T-Mobile would otherwise possess *vis a vis* EBS licensees, thus putting EBS licensees at a more level bargaining position when negotiating terms of spectrum lease agreements, including in-kind educational service.

Please contact undersigned counsel should any question arise concerning this matter or if additional information is required.

Sincerely,

/s/ Mark Van Bergh

Mark Van Bergh

cc: FCC participants listed in Attachment A (by email)

ATTACHMENT A

David Lawrence

Kathy Harris

Jim Bird

Saurbh Chhabra

David Sieradzki

Catherine Matraves (by phone)