

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Incentive Auction Task Force and Media	)	MB Docket No. 16-306
Bureau Seek Comment on Post-Incentive Auction	)	GN Docket No. 12-268
Transition Scheduling Plan	)	

To: The Commission

**COMMENTS OF CTIA**

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**I. INTRODUCTION AND SUMMARY.**

CTIA<sup>1</sup> respectfully submits these comments in response to the *Post-Auction Transition Schedule Public Notice*, which proposes a phased approach to repacking television broadcast stations following the conclusion of the incentive auction.<sup>2</sup> CTIA strongly supports efforts by the Commission to develop a process that will expedite the transition of television broadcast stations from the 600 MHz band. The 600 MHz band and the Commission’s first-of-its-kind incentive auction represent critical efforts that will help enable the wireless industry to maintain global leadership in the provision of mobile broadband services. In 2015, North American users consumed more data traffic per subscriber per month than any other geographic area in the

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<sup>1</sup> CTIA<sup>®</sup> (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21<sup>st</sup> century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

<sup>2</sup> *Incentive Auction Task Force and Media Bureau Seek Comment on Post-Incentive Auction Transition Scheduling Plan*, Public Notice, DA 16-1095, MB Docket No. 16-306, GN docket No. 12-268 (rel. Sept. 30, 2016) (“*Post-Auction Transition Schedule Public Notice*”).

world.<sup>3</sup> Estimates show that by 2020, there will be a six-to-seven-fold increase in data usage by the average subscriber in North America.<sup>4</sup> Indeed, it is estimated that mobile data traffic will grow twice as fast as fixed IP traffic from 2015 to 2020.<sup>5</sup>

This staggering growth will only accelerate with the development and deployment of 5G networks and services. By 2021, Ericsson estimates that there will be approximately 28 billion connected devices deployed, nearly 16 billion of which will be related to the Internet of Things (“IoT”).<sup>6</sup> Industries such as healthcare, the wearables market, and the automotive industry will be able to leverage 5G technologies to create an unprecedented degree of connectivity for American consumers.

The wireless industry requires expeditious access to a variety of spectrum—low-, mid-, and high-band—to allow the development and deployment of 5G services to become a reality, and the 600 MHz band is a crucial low-band component to unleashing that innovation. The Commission should therefore be applauded for working to rapidly repurpose this spectrum band for mobile broadband services. In particular, the proposals made in the *Post-Auction Transition Schedule Public Notice*, with some minor additions and changes, would allow for an expeditious transition for television broadcast stations while simultaneously ensuring that physical and human resources are utilized in the most effective fashion. Specifically, the Commission should:

- **Expediently initiate a phased relocation approach.** The proposed methodology for phasing the repacking transition has been carefully crafted to enhance the efficient use of all resources needed to effectuate the relocation of television broadcast stations. The Commission should initiate this process prior to

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<sup>3</sup> Comments of CTIA, WT Docket No. 16-137, at 14 (filed May 31, 2016).

<sup>4</sup> *Id.*

<sup>5</sup> Cisco, Visual Networking Index Mobile Forecast, available at [http://www.cisco.com/assets/sol/sp/vni/forecast\\_highlights\\_mobile/index.html#~Country](http://www.cisco.com/assets/sol/sp/vni/forecast_highlights_mobile/index.html#~Country).

<sup>6</sup> *Ericsson Mobility Report: On the Pulse of the Networked Society*, at 10 (June 2016), <https://www.ericsson.com/res/docs/2016/ericsson-mobility-report-2016.pdf>.

the completion of the incentive auction as proposed and should steadfastly attempt to maintain the 39-month timeline for repacking. Use of specific software tools as well as temporary increases in the interference environment during the transition should be encouraged.

- **Adopt a transparent post-auction process that includes oversight of the transition schedule.** Wireless licensees will require comprehensive information about the status of the relocation and transition process. The Commission should endeavor to provide all affected stakeholders with needed information in an effective and transparent manner. Designation of an internal or external project manager will greatly increase the likelihood of such transparency. The project manager should maintain an overall schedule of the transition process and publish this information on a consistent basis as well as hold regular discussions with wireless and broadcast television licensees.
- **Take additional steps to ensure wireless licensees can rapidly deploy in the 600 MHz band.** The Commission’s proposal could be improved by allowing more flexibility in use of temporary measures to address intractable relocation issues. Utilization of temporary channels, facilities, and channel sharing should be permitted. Moreover, the Commission should apply a high standard for any potential delays or waivers of the transition process, and should take into consideration the effects on 600 MHz licensees.

## **II. THE PROPOSED POST-INCENTIVE AUCTION TRANSITION PLAN PROVIDES A WORKABLE FRAMEWORK FOR ENABLING AN EFFICIENT REPACKING PROCESS.**

In the *Post-Auction Transition Schedule Public Notice*, the Incentive Auction Task Force (“IATF”) and Media Bureau (“MB”) have proposed to create a phased transition schedule for broadcasters that are reassigned to a new television channel. The proposed phased approach is “designed to provide information to stations, vendors, and other industry participants in a way that will allow them to plan for and respect the obligations and resource requirements of stations that are assigned to earlier phases.”<sup>7</sup> CTIA supports this effort and encourages the Commission to adopt its proposal, with the modifications suggested in these comments, in order to “smooth the way for station coordination, promote efficient allocation of limited resources, limit the

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<sup>7</sup> *Post-Auction Transition Schedule Public Notice* ¶ 4.

impact of the transition on consumers, and facilitate FCC monitoring to determine whether schedule adjustments are necessary during the course of the transition process.”<sup>8</sup>

**A. The Post-Auction Transition Plan is Designed to Help Eliminate Relocation Inefficiencies.**

Under the proposed plan, television stations that require relocation would be assigned to one of ten transition phases with sequential testing periods and deadlines.<sup>9</sup> Each station assigned to a given phase would be required to cease operating on its pre-auction channel at the end of the phase—*i.e.*, the “phase completion date.”<sup>10</sup> To determine the phase completion date for each broadcast television station subject to repacking, the IATF and MB propose to use two computer-based tools: the “Phase Assignment Tool” and the “Phase Scheduling Tool.”<sup>11</sup> The Phase Assignment Tool uses both constraints and goals to determine which stations are assigned to which of the ten phases for transition completion.<sup>12</sup> The goals of the Phase Assignment Tool are to prioritize the transition for television stations that are in the new 600 MHz band, minimize the number of rescans for television viewers, minimize the number of linked-stations, and

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<sup>8</sup> *Id.*

<sup>9</sup> *Post-Auction Transition Schedule Public Notice* ¶ 4.

<sup>10</sup> *Id.* at Appendix A ¶ 19.

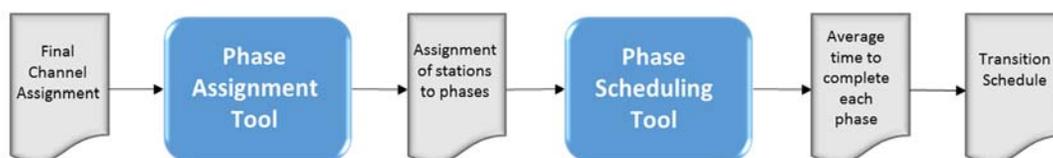
<sup>11</sup> *Id.* ¶ 5.

<sup>12</sup> See *Transition Scheduling Plan Webinar*, at 27 (presented Oct. 17, 2016), <https://www.fcc.gov/sites/default/files/Transition%20Scheduling%20Plan%20Webinar%2020161017.pdf>. The constraints of the Phase Assignment Tool are: (1) every transitioning station will be assigned to one transition phase; (2) there will be no more than 10 transition phases; (3) no U.S. station will be assigned to a temporary channel; (4) no station falling into the “complicated” category for purposes of the Phase Scheduling Tool can be assigned to Phase 1; (5) all stations within a DMA will be assigned to no more than two different transition phases; (6) the difference in the number of stations in the largest transition phase and the smallest transition phase will be no more than 30 stations; (7) no phase can have more than 125 linked-stations; (8) a station cannot cause more than two percent new interference to another station during the transition; and (9) no stations in Canada will be assigned to transition before the third transition phase and no Canadian stations will be assigned a temporary channel. *Id.* at 28-29.

minimize the difference between the number of stations in the largest and smallest transition phases.<sup>13</sup> The Phase Scheduling Tool, on the other hand, estimates the total time necessary for stations to perform the tasks required to complete the transition process.<sup>14</sup> The tasks are divided into two stages: (1) the pre-construction stage where planning and equipment procurement occurs; and (2) the construction stage where construction and tower work is completed.<sup>15</sup>

Importantly, the IATF and MB anticipate that the final channel assignment plan and the phase assignments can be completed prior to the conclusion of the forward auction.<sup>16</sup> The Commission contemplates sending each eligible station a confidential letter identifying the station's post-auction channel assignment, technical parameters, and assigned transition phase.<sup>17</sup> This will allow affected television broadcast stations additional time to plan and compile the information needed to file their applications within the three-month window for applications following the post-auction close.<sup>18</sup>

A flow chart corresponding to the proposed process is below<sup>19</sup>:



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<sup>13</sup> *Id.* at 30-31.

<sup>14</sup> *Id.* at 61.

<sup>15</sup> *Id.*

<sup>16</sup> *Post-Auction Transition Schedule Public Notice* ¶ 5.

<sup>17</sup> *Id.*

<sup>18</sup> The three-month timeline will start with the release of the Auction Closing and Channel Reassignment PN that will announce that the reverse and forward auctions have ended and specify the effective date of the post-auction repacking. *Id.* See also *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 6797, ¶ 525 (“*Incentive Auction Order*”).

<sup>19</sup> *Post-Auction Transition Schedule Public Notice* ¶ 11.

## **B. CTIA Supports Efforts to Expediently Initiate a Phased Relocation Process.**

CTIA and its member companies are encouraged by the careful thought and planning that is encompassed in the proposed post-incentive auction transition plan. By dividing the transition process into ten separate phases, the IATF and MB have proposed an approach that will help to eliminate inefficiencies that would be present in a relocation process that was not segmented. Absent this sort of orderly methodology, broadcasters would potentially be competing against other broadcasters to obtain physical and human resources without any thought to the most efficient allocation of these inputs. Further, CTIA supports the use of the two optimization tools, the Phase Assignment and Scheduling Tools, to best determine the timing for a particular broadcast station to relocate as well as the length of time it will take for that station to complete its transition.

Given the urgency for post-auction access to the 600 MHz spectrum, CTIA strongly agrees with the proposal to initiate the relocation process prior to the completion of the forward auction. The IATF and MB will have all the needed information about broadcasters once the final stage rule has been satisfied.<sup>20</sup> However, the forward auction may continue on for an extended period of time, as neither the forward auction clock phase nor the forward auction assignment phase would yet be complete. By initiating the relocation schedule prior to the completion of the auction, the Commission will jumpstart the transition without any adverse effect to broadcast stations.

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<sup>20</sup> Once the forward auction satisfies the final stage rule, no additional stages will be required. At that time, it will be possible to finalize the provisional television channel assignment plan for the remaining television stations. *See Broadcast Incentive Auction Scheduled to Begin March 29, 2016; Procedures for Competitive Bidding in Auction 1000, Including Initial Clearing Target Determination, Qualifying to Bid, and Bidding in Auctions 1001 (Reverse) and 1002 (Forward)*, GN Docket No. 12-268, Public Notice, 30 FCC Rcd 8975, 9100, ¶ 271 (2015).

**C. CTIA Urges the Commission to Maintain the Relocation Timeline.**

CTIA and its members appreciate that the IATF and MB have made every effort to adopt a transition schedule that maintains the required 39-month relocation timeline. Forward auction license winners expect that the 600 MHz spectrum will clear rapidly and, in the worst case, no more than 39 months after the completion of the incentive auction. The IATF and MB proposal for the transition schedule recognizes the urgency for clearance of the television spectrum and adopts a rigorous program for the repacking that will increase the possibilities that the 39-month deadline remains feasible. CTIA continues to urge the Commission to maintain the relocation timing as a key objective of its transition schedule.

**D. CTIA Agrees That a Temporary Increase in the Interference Environment Will Improve the Overall Repacking Process.**

The *Post-Auction Transition Schedule Public Notice* proposes to allow temporary pairwise interference increases of up to two percent (as compared to the 0.5 percent threshold authorized by the rules governing permanent interference) during the transition, which it believes would produce substantial benefits without undue disruption to television service.<sup>21</sup> CTIA agrees with this proposal. As the Commission has found in similar circumstances, a temporary increase in the interference environment reduces the inter-dependencies between stations and the amount of coordination needed to allow testing of a station's post-auction facility.<sup>22</sup> Moreover, the staff analysis indicates that temporarily increasing the interference limit only results in *aggregate* interference exceeding the pairwise limits in a small number of cases.<sup>23</sup> According to the staff analysis included in the appendix to the *Post-Auction Transition Schedule Public*

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<sup>21</sup> *Post-Auction Transition Schedule Public Notice* ¶ 10.

<sup>22</sup> *Id.* ¶ 9.

<sup>23</sup> *Id.* at Appendix A, at 14.

*Notice*, increasing the temporary interference limit for an 84 MHz clearing scenario only resulted in 14 television stations with aggregate interference greater than two percent (out of a total of 1,274 stations that required repacking).<sup>24</sup> In return for this modest effect to 14 television stations, the overall repacking process was greatly improved—the size of the largest linked-station set dropped from 305 to 105 and the number of stations in the largest phase of the transition reduced from 306 to 134 stations.<sup>25</sup> This extensive reduction in complexity for the repacking transition provides substantial public interest benefits that greatly exceed the minimal effect of temporarily changing the interference threshold.

### **III. TRANSPARENCY WILL BE CRITICAL TO THE SUCCESS OF THE POST-AUCTION REPACKING PROCESS.**

Although CTIA supports the overall transition schedule proposal, the Commission should assure that the process is as transparent as possible. New 600 MHz wireless licensees will need to have comprehensive information on the status of the transition, including detailed information on any issues that could lead to potential delays in any phase of the transition. To enhance the openness of the relocation process, CTIA recommends that the Commission—either itself or through a third party—establish an overall project manager dedicated full-time to the transition process. The project manager would maintain a schedule of the repacking, tracking each individual broadcast station relocation in each phase of the transition. Utilization of a project manager would help the Commission ensure that the schedules for repacking are maintained and would provide an early warning to all affected parties of any issues that could potentially lead to delays.

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<sup>24</sup> *Id.* at Appendix A, at 14.

<sup>25</sup> *Id.*

CTIA believes that the transition project manager should be responsible for monitoring both physical and human resources. Physical resources (*e.g.*, towers, transmitters, antennas), especially those that may be limited such as antennas, are expected to be queued up until manufacturing capacity is available.<sup>26</sup> Access to scarce resources will be prioritized by phase assignment (*i.e.*, Phase 1 before Phase 2, etc.) and then by station order within the phase (the Phase Assignment Tool will order stations within the phase for resources).<sup>27</sup> Similarly, human resources (*e.g.*, consulting engineers, tower crews, attorneys) may also be queued up as part of the transition process where there is scarcity, most likely for tower crews.<sup>28</sup> A dedicated project manager would be best positioned to monitor all the resources—and the queues for resources—to gauge if the relocation process is progressing smoothly or if there is a need for any intervention to alleviate any roadblocks.

Finally, the scheduling and resource data compiled by the project manager should be published on a consistent basis to allow parties to understand the status of the transition as well as how supply of resources is matching demand. CTIA believes it would be beneficial if the project manager scheduled regular discussions with all affected stakeholders to allow visibility into the process and to jointly discuss any issues associated with the relocation that may require additional attention.

Use of a project manager in this fashion is not without precedent. In other successful transitions, such as the relocation of Broadcast Auxiliary Service systems in the 2.5 GHz band<sup>29</sup>

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<sup>26</sup> *Transition Scheduling Plan Webinar* at 66.

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 67.

<sup>29</sup> See *e.g.*, Esther Shein, *Sprint Completes BAS Transition*, INFORMATIONWEEK GOVERNMENT (July 21, 2010, 11:16 a.m.), <http://www.informationweek.com/business/sprint-completes-bas-transition/d/d-id/1090952?>

and fixed microwave systems out of the 2 GHz band,<sup>30</sup> there was a dedicated resource managing and monitoring the status of the process. Additionally, during the digital television transition, the Commission and NTIA relied upon dedicated internal and external resources to monitor the progress of the transition.<sup>31</sup> Given that the transition process to clear the 600 MHz band for wireless licensees is the limiting factor to deployment of the spectrum, CTIA suggests that the Commission deploy similar resources as it has in the past to supervise and oversee the relocation of broadcast television stations.

#### **IV. GREATER FOCUS SHOULD BE PLACED ON ENSURING THAT WIRELESS LICENSEES ARE ABLE TO EXPEDITIOUSLY DEPLOY AT 600 MHZ.**

In addition to increasing the transparency and management of the transition process, CTIA believes there are other efforts that could be undertaken to better prioritize the clearing of the 600 MHz band for wireless services. Licensees of the 600 MHz band will have an expectation of access to their licensed spectrum shortly after the license is issued. CTIA encourages the Commission to explore all possible methods to mitigate any delays associated with the relocation process while simultaneously including affected wireless licensees as part of any decisions that could adversely affect their ability to rapidly deploy in the 600 MHz band.

##### **A. A Broader Range of Potential Temporary Options Should Be Permitted During the Transition.**

The IATF and MB have tentatively concluded not to use temporary channels for broadcasters during the transition, and, if convinced otherwise, would limit their use solely to

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<sup>30</sup> *Amendment to the Commission's Rules Regarding a Plan for Sharing the Costs of Microwave Relocation*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8825 (1996).

<sup>31</sup> See e.g., NTIA Press Release, 1 Day Until DTV Transition (June 11, 2009), <https://www.ntia.doc.gov/press-release/2009/1-day-until-dtv-transition>.

Class A (*i.e.*, low-power) television stations.<sup>32</sup> Not only should the Commission keep open the possibility of utilizing temporary channels, it should also consider use of other temporary measures during the transition such as temporary facilities or channel sharing. CTIA believes it is premature to completely reject any potential tool that may help in expediting the transition of the 600 MHz band. While the IATF and MB have asserted that their simulations of the use of temporary channels only yielded minor benefits,<sup>33</sup> CTIA notes that the number of linked-stations, the size of the largest linked-station set, and the number of markets requiring multiple rescans by television viewers was reduced.<sup>34</sup> The IATF and MB should have the flexibility to use temporary channels (for *any* television station, not just Class A stations) if it is determined to be helpful for a particular market. CTIA does, however, agree that utilization of a temporary channel (given the complexity of this solution) should be limited and used only as a last resort.

There are two additional tools that should be considered by the IATF and MB. First, broadcasters should be permitted to use temporary or auxiliary facilities to meet the phase completion deadline. A temporary facility could be used by a broadcaster instead of its final channel assignment in instances where the broadcaster may be unable to comply due to zoning issues, tower loading limits, lack of antenna resources, or other manufacturing delays. CTIA understands that use of such temporary facilities may require a period of time where the broadcast facility is not operating at its full power or coverage capabilities. Second, broadcasters should be permitted to enter into temporary channel sharing arrangements. It is conceivable that a broadcast station in a particular market may have capacity to enter into a temporary channel

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<sup>32</sup> *Post-Auction Transition Schedule Public Notice* ¶ 10.

<sup>33</sup> *Id.* at Appendix A, at 12.

<sup>34</sup> *Id.*

sharing agreement that would permit another broadcaster that was unable to relocate to its final channel allotment another interim option rather than seeking a delay to its transition. CTIA would note that neither of these temporary solutions should be mandated for broadcasters and any of these temporary options (temporary channel, facility, or channel sharing) should not affect the broadcaster's carriage rights (*i.e.*, all must carry/retransmission rights would remain the same as if the broadcaster had migrated to its final channel assignment).

**B. Requests for Waiver or Extension of Transition Requirements Should Be Subject to a High Bar and Coordinated with 600 MHz Licensees.**

The IATF and MB note that some stations may seek to construct an expanded facility or alternate channel that differs from the technical parameters assigned in the *Auction Closing and Channel Reassignment PN* and that some stations may request extensions of their construction deadlines.<sup>35</sup> The Commission proposes to examine the impact that grant of such requests would have on the phased transition schedule prior to granting them.<sup>36</sup> In addition, the IATF and MB tentatively conclude that they will rely on existing rules and procedures to address concerns with phase assignments, phase completion dates, and/or testing periods, but seek comment on whether the Commission should establish an alternative process to facilitate the transition.<sup>37</sup> Under the proposal, requests that have little or no impact on the phase assignments or transition schedule would be viewed favorably, while those that would likely delay or disrupt the transition would be viewed unfavorably.<sup>38</sup> However, requests that would otherwise likely delay or disrupt the

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<sup>35</sup> *Post-Auction Transition Schedule Public Notice* ¶ 27.

<sup>36</sup> *Id.*

<sup>37</sup> *Id.* ¶ 26.

<sup>38</sup> *Id.* ¶ 27.

transition would be viewed more favorably if the requesting station demonstrates that it has the approval of all the stations that would be affected if the request were granted.<sup>39</sup>

CTIA supports this approach. The Commission has set out existing rules and procedures to handle these requests, and the IATF and MB should not undermine the certainty associated with the regulatory framework adopted in the *Incentive Auction Order*.<sup>40</sup> CTIA does not believe that individual stations that wish to raise concerns regarding their particular phase assignments, phase completion dates, and/or testing periods should have any “alternative” process established to handle these requests.

Moreover, CTIA recommends that there should be a strong presumption against modifying broadcaster transition plans, as each action within the transition is interrelated and could have unintended consequences for the overall relocation process. For example, a broadcaster that requests an expanded facility that would have no effect on the phase completion date may be using engineering or manufacturing resources that could have been used by other relocating broadcasters and therefore affect relocation timing. As such, any request for modification to the phase transition plan should be subject to a high bar by the Commission, placed on public notice to seek comment by all affected stakeholders (including affected wireless licensees in the market and adjacent markets), and be required to provide substantial evidence that the change to the relocation plan for the station would have no adverse effects on the overall transition.

CTIA notes that the *Post-Auction Transition Schedule Public Notice* fails to consider the effects of modifications on 600 MHz licensees and instead focuses solely on the effects of such

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<sup>39</sup> *Id.*

<sup>40</sup> *Incentive Auction Order* ¶¶ 539-585.

requests on other broadcasters. The *Post-Auction Transition Schedule Public Notice* notes that the Commission may look favorably upon any requested change so long as all television broadcasters in the market approve, but makes no mention of obtaining the approval of affected wireless licensees. CTIA requests that the Commission require that broadcast licensees seeking changes that would have an adverse effect in a market also obtain consent from affected wireless licensees in the market. In this manner, requests that may delay the relocation process will be vetted by 600 MHz licensees in the market prior to the submission of any request to the Commission.

**V. CONCLUSION.**

The wireless industry is prepared to expend significant resources in the deployment and integration of 600 MHz spectrum into the mobile ecosystem. These efforts cannot commence until existing television broadcast use is transitioned out of the spectrum. CTIA is encouraged that the IATF and MB have proposed a comprehensive plan for the transition that allows for effective use of resources and proceeds in a reasonable and expeditious manner. This framework, with the additions and changes suggested in these comments, should ensure that the 39-month transition period for broadcasters is maintained and allow the wireless industry to commence operations in the 600 MHz band in a timely manner.

Respectfully submitted,

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