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EX PARTE VIA ELECTRONIC FILING

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

Re: *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, GN Docket No. 14-177;
IB Docket No. 15-256; WT Docket No. 10-112; IB Docket No. 97-95.

Dear Ms. Dortch:

On March 19, 2018, Hank Hultquist, Stacey Black, Alex Starr, Jessica Lyons and Michael Goggin of AT&T, met with Don Stockdale, Dana Shaffer, Joel Taubenblatt, Simon Bunyai, Blaise Scinto, Stephen Buenzow (by phone), John Schauble, Martha Stancill, Gary Michaels, Margaret Weiner, and Matthew Pearl of the Wireless Telecommunications Bureau, and Evan Kwerel and Paul LaFontaine from OSP.

During the meeting, AT&T discussed alternative methods for temporarily repacking the 37.6-40 GHz band in advance of an auction of millimeter wave spectrum. AT&T also discussed the auction proposal it submitted previously in this docket; a clock auction, with generic, fungible spectrum blocks to be followed by an assignment phase. AT&T advocated for an auction including all of the mmW bands at the earliest possible date.

AT&T also addressed some comments from Verizon Wireless in which Verizon objected to AT&T's clock auction proposal in the mistaken belief that it would disadvantage incumbents. AT&T noted that no incumbent would be required to participate in the auction, but that incumbents who did participate would have a means to put the value of their current 50 x 50 MHz paired spectrum toward 200 MHz contiguous blocks, and would have the opportunity to choose which blocks they received in the assignment round. Incumbents who choose not to participate in an auction would be able to maintain all of their spectrum rights, and would also obtain contiguous blocks under AT&T's proposal. Accordingly, while the auction would afford incumbents the opportunity to improve their spectrum holdings, it would not disadvantage them in any way.

Sincerely,

/s/ Michael P. Goggin

cc: Don Stockdale
Dana Shaffer
Joel Taubenblatt
Blaise Scinto
John Schauble
Matthew Pearl
Simon Bunyai
Stephen Buenzow
Paul LaFontaine
Evan Kwerel
Martha Stancill
Gary Michaels
Margaret Wiener