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May 13, 2019

Ex Parte

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

**Re: Notice of Initial 39 GHz Reconfiguration Procedures
GN Docket No. 14-177, AU Docket No. 19-59**

Dear Ms. Dortch:

On May 9, 2019, Ibrahim Abdullah (via teleconference), Catherine Hilke, Philip Junker (via teleconference), Tamara Preiss, and Doug Reeves of Verizon met with Simon Banyai, Jonathan Campbell, Erin Fitzgerald, Blaise Scinto, Dana Shaffer, Don Stockdale, Joel Taubenblatt, Jennifer Tomchin, of the Wireless Telecommunications Bureau; Joseph Calascione, Patrick DeGraba, Jill Goldberger, Shabnam Javid, Giulia McHenry (via teleconference), Mark Montano, Erik Salovaara (via teleconference), Martha Stancill, and Margaret Wiener of the Office of Economics and Analytics; Doug Klein and Joel Rabinovitz of the Office of General Counsel; and Jae Seong and Mark Stephens of the Office of Managing Director. During the meeting, we discussed the Commission's proposed 39 GHz reconfiguration procedures and Verizon's comments and reply comments on those procedures.

Verizon reiterated its request that the Commission allow applicants with commonly controlled entities that surrender existing 39 GHz licenses to identify the entities to which the Commission ultimately will issue licenses or incentive payments. Issuing licenses or incentive payments to a single licensee could have adverse tax implications that would drive down the value of spectrum in Auction 103, contrary to the public interest. We clarified that the purpose of this request—to mitigate the possibility of unnecessary, adverse tax consequences—would be fully realized if the Commission limits the eligible recipients of licenses and incentive payments at the end of the auction process to the entities that were incumbent 39 GHz licensees at the beginning of the auction. We also discussed how the Commission could implement this proposal.

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Verizon also discussed why the Commission should exclude Auction 97 from its price index for incumbent 39 GHz licenses in Auction 103 and why the Commission should equally weight Auctions 102 and 1002 in that price index.

Please let me know if you have any questions.

Sincerely,



Catherine M. Hilke

cc: (via email)

Simon Banyai
Jonathan Campbell
Erin Fitzgerald
Blaise Scinto
Dana Shaffer
Don Stockdale
Joel Taubenblatt

Jennifer Tomchin
Joseph Calascione
Patrick DeGraba
Jill Goldberger
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