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September 14, 2017

***VIA ELECTRONIC FILING***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: *Ex Parte Notification***

*In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268;*

*Applications of Tribune Media Company and Sinclair Broadcast Group For Consent to Transfer Control of Licenses and Authorizations, MB Docket No. 17-179;*

*Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard, GN Docket No. 16-142; and*

*Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354*

Dear Ms. Dortch:

On September 12, 2017, I, along with Kathleen Ham and Neville Ray, all of T-Mobile USA, Inc. (“T-Mobile”),<sup>1</sup> met with Chairman Ajit Pai and his Legal Advisor Rachael Bender. On September 13, we had separate meetings with Commissioner Mignon Clyburn and her Legal Advisor Daudeline Meme; Commissioner Michael O’Rielly and his Legal Advisor Erin McGrath; and Commissioner Brendan Carr and his Acting Legal Advisor Kevin Holmes. In each meeting, we addressed the above-referenced proceedings.

In particular, during each meeting, we provided a general update on T-Mobile’s latest Un-carrier moves and network deployment. We described the efforts that T-Mobile has taken to ensure that service remains available to areas affected by Hurricanes Harvey and Irma and to restore service where it has been disrupted.

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<sup>1</sup> T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

We also explained how the 600 MHz auction is a huge win for consumers and for T-Mobile, which has already begun deploying the spectrum in certain markets and has expansion plans in many others. We explained how the 600 MHz spectrum will be used to provide Fifth Generation (“5G”) services. In this regard, we explained the importance of holding broadcasters to the 39-month timeframe set forth in the rules, and explained that T-Mobile is working cooperatively with the broadcasting community to ensure there are sufficient resources available for a successful transition.

We expressed our concern that the proposed transfer of control of subsidiaries of Tribune Media Company (“Tribune”) to Sinclair Broadcast Group, Inc. (“Sinclair”) will impede the efforts to repack the broadcast spectrum and permit T-Mobile the access it anticipated to the 600 MHz spectrum it acquired in the spectrum auction. As stated in our comments in that proceeding, if the Commission approves the Sinclair transaction, the Commission should condition approval on the imposition of a clear and unambiguous obligation to comply with the repacking timetable that the Commission has adopted; impose substantial penalties for failing to meet this timetable; and forbid Sinclair or Tribune from requesting any ATSC 3.0-related concessions from carriers in negotiations to accelerate Sinclair’s departure from the 600 MHz band.

Similarly, we stated that the introduction of ATSC 3.0 technology should not delay the repacking of the 600 MHz broadcast spectrum and that there should be no mandate for wireless providers to include ATSC 3.0 technology in their devices. We noted that T-Mobile submitted a technical white paper on September 11, 2017 entitled “Complications Associated With ATSC 3.0 Implementation In Mobile Devices.” The paper discusses in detail the significant challenges associated with ATSC 3.0 reception in existing mobile devices.

Finally, we stated the importance of having sufficient spectrum in the low, mid, and high bands to support competitive 5G deployments. We noted that the existing 3.5 GHz framework should be revised because the current structure will not drive investment and does not align with international use of the band for 5G. We explained that the 3.5 GHz spectrum is a core band for 5G deployment around the world and that the U.S. will miss a huge opportunity if it does not create a structure aligned with global 5G requirements.

Pursuant to Section 1.1206(b)(2) of the Commission’s rules, an electronic copy of this letter is being filed in the above-referenced dockets. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey

Vice President, Government Affairs  
Technology and Engineering Policy

cc: Hon. Ajit Pai  
Hon. Mignon Clyburn  
Hon. Michael O’Rielly

Hon. Brendan Carr  
Daudeline Meme  
Erin McGrath  
Kevin Holmes