



September 15, 2021

*Via ECFS*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: *Written Ex Parte Communication***

**WT Docket No. 18-120**, *Transforming the 2.5 GHz Band*  
**AU Docket No. 20-429**, *Auction of Flexible-Use Service Licenses in the 2.5 GHz Band for Next-Generation Wireless Services; Comment Sought on Competitive Bidding Procedures for Auction 108*

Dear Ms. Dortch:

As the Commission has correctly determined, the 2496-2690 MHz (“2.5 GHz”) band is critical to help provide 5G services to Americans.<sup>1/</sup> In fact, T-Mobile USA, Inc. (“T-Mobile”)<sup>2/</sup> has already begun to deploy the 2.5 GHz band to do just that.<sup>3/</sup> Yet, it has been over two years since the Commission adopted new rules governing the 2.5 GHz band and nearly eight months since the Commission proposed procedures to auction the spectrum. In order to realize the full promise of the 2.5 GHz band, particularly in suburban and rural areas, the Commission should set a date for the 2.5 GHz auction to begin and finalize auction procedures.

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<sup>1/</sup> See *Auction of Flexible-Use Service Licenses in the 2.5 GHz Band for Next-Generation Wireless Services; Comment Sought on Competitive Bidding Procedures for Auction 108*, Public Notice, 36 FCC Rcd 645, ¶ 1 (2021); see also *Transforming the 2.5 GHz Band*, Report and Order, 34 FCC Rcd 5446, ¶ 2 (2019).

<sup>2/</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

<sup>3/</sup> See, e.g., Christine Torralba, *T-Mobile: OnTrack with Its Rural Expansion Plans*, TMONEWS (June 4, 2021), <https://www.tmonews.com/2021/06/t-mobile-track-rural-expansion-plans/> (stating that T-Mobile’s “600 MHz spectrum already covers 295 million individuals with 5G” and “[b]y the end of 2023, they are expected to increase that number to 300 million with its 2.5GHz spectrum”); Mike Dano, *Nevill Ray Explains T-Mobile’s Near-Term 5G Opportunities*, LIGHT READING (Sept. 1, 2021), <https://www.lightreading.com/5g/neville-ray-explains-t-mobiles-near-term-5g-opportunities/d/d-id/771831>.



The Commission should reject the attempts of AT&T Services Inc. (“AT&T”) to impair the continued deployment of the 2.5 GHz band, which will be the result if, as AT&T urges, the Commission uses a single-round, sealed-bid auction with pay-as-bid pricing (“PAB-SRSB”) structure to auction vacant 2.5 GHz band spectrum or to delay the auction of the spectrum by calling for a change to the already-adopted rules in order to seek confidential business information regarding leases. As T-Mobile has explained, a PAB-SRSB approach would favor speculators and not service providers – service providers that compete with AT&T. Instead, the familiar simultaneous multiple round (“SMR”) auction format will produce auction results that best serve the public interest. Not only will an SMR auction enable bidders to make informed bidding decisions, which will encourage participation, but it will also produce efficient auction results. AT&T has presented no compelling information to the contrary, and its alleged concerns about speed and competitive harm are mere fig leaves. AT&T has similarly provided no justification – beyond the obvious goal of seeking competitively-sensitive information – for the Commission to require T-Mobile to produce leasing information related to the 2.5 GHz band. Further, calling for such a change must be rejected as a late-filed petition for reconsideration of the rules governing leasing in general and governing the 2.5 GHz band in particular. Instead, it is another transparent attempt by AT&T to withhold spectrum from its competitors.

### ***An SMR Auction is More Appropriate for the 2.5 GHz Band***

AT&T contends that the Commission should not conduct an auction of the 2.5 GHz band using an SMR format because of the unique circumstances related to the band.<sup>4/</sup> But the unique circumstances of the 2.5 GHz band are precisely why an SMR auction is the best approach. As T-Mobile explained and AT&T recognizes,<sup>5/</sup> the 2.5 GHz auction will include more than 8,300 unique licenses. And because those licenses will be “overlaid” on existing spectrum licenses, the characteristics of many of them – even in the same geographic area – may vary significantly. An SMR auction is essential in these circumstances because it allows for price discovery, which enables participants to effectively determine the value of a license based on the specific spectrum made available and the geographic area covered.<sup>6/</sup>

AT&T suggests that other bidders with more localized interests in the 2.5 GHz band will have “a strong understanding of the value of spectrum to them” and therefore will not be hampered significantly by a lack of price discovery.<sup>7/</sup> But an efficient auction results in the sale of a product at market value – not the value assigned by a single bidder. A PAB-SRSB auction frustrates that result. Simply because a bidder has a strong understanding of the value of

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<sup>4/</sup> See Letter from Michael P. Goggin, AT&T, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 20-429, at 1 (filed Aug. 17, 2021) (“AT&T Aug. 17, 2021 *Ex Parte* Letter”).

<sup>5/</sup> See Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120, *et al.*, at 2-3 (filed June 23, 2021) (“T-Mobile June 23, 2021 *Ex Parte* Letter”); AT&T Aug. 17, 2021 *Ex Parte* Letter at 1.

<sup>6/</sup> See T-Mobile June 23, 2021 *Ex Parte* Letter at 3 (adding that there is little information publicly available about secondary market transaction pricing for spectrum and the value of spectrum in a particular auction can vary widely, making them unreliable indicators of future spectrum prices).

<sup>7/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 3.

spectrum to *them* does not mean that it has an understanding of the value of spectrum to *others* – a key component of market value. The price discovery available through an SMR format is the only way bidders can evaluate the market value of a license as well as react, in real-time, to other bidders’ actions, adjust their bidding strategies, and implement potential back-up plans to optimize their holdings while satisfying budgetary constraints. As AT&T’s own economic experts have explained, “[a] bidder’s valuation of a particular license may depend on which complementary licenses he is also able to acquire. Further, the desirability of one combination of licenses will depend on the prices at which alternative combinations are available. . . . This facilitation of ‘price discovery’ can enable bidders to focus on the most relevant sets of licenses and to reoptimize their spectrum aggregation strategies as the auction proceeds.”<sup>8/</sup>

While AT&T acknowledges that the price discovery mechanism of an SMR auction is a “key benefit,” it nevertheless claims that price discovery would give T-Mobile an “enormous advantage” because it would enable T-Mobile, which has “strong incentives” to fill out its nationwide footprint with 2.5 GHz band spectrum, to discover which licenses have little or no competition and use “cost-averag[ing]” to win them at prices below its valuation.<sup>9/</sup> No facts support AT&T claims. History has demonstrated just the opposite – that T-Mobile acts as an economically rational bidder. As T-Mobile has explained,<sup>10/</sup> it has been frequently outbid by others, even when the geographic area or spectrum on which it bids is complementary to its existing holdings. There is no reason to anticipate that T-Mobile’s behavior will depart from this established practice now.

### ***An SMR Auction Can Be Conducted Quickly Without Harming Smaller Bidders***

AT&T rehashes its claim that an SMR auction would be onerous to bidders and deter participation because it could “last for months” with a prolonged prohibited communications quiet period.<sup>11/</sup> T-Mobile has already demonstrated why that is not true.<sup>12/</sup> The Commission can utilize tools such as adjusting bid increments and permitting intra-round bids in order to speed the pace of the auction. It could also employ switching constraints similar to those used in the

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<sup>8/</sup> See Comments of AT&T, Inc., GN Docket No. 12-268, at Exhibit B at 6 (filed Jan. 25, 2013).

<sup>9/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 2.

<sup>10/</sup> See T-Mobile June 23, 2021 *Ex Parte* Letter at 4 (noting that even though AWS-3 spectrum was complementary to its existing AWS-1 spectrum holdings, T-Mobile was outbid in many markets by several others, including smaller bidders, that valued the spectrum more highly); see also *Auction of Advanced Wireless Services (AWS-3) Licenses Closes; Winning Bidders Announced for Auction 97*, Public Notice, 30 FCC Rcd 630, at Attach. A, Attach. B (2015).

<sup>11/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 2.

<sup>12/</sup> See, e.g., T-Mobile June 23, 2021 *Ex Parte* Letter at 3-4; Letter from Steve B. Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 and AU Docket No. 20-429, at 4-5 (filed Feb. 18, 2021) (“T-Mobile Feb. 18, 2021 *Ex Parte* Letter”); Comments of T-Mobile USA, Inc., AU Docket No. 20-429, at 7 (filed May 3, 2021) (“T-Mobile Comments”); Reply Comments of T-Mobile USA, Inc., AU Docket No. 20-429, at 14 (filed May 27, 2021) (“T-Mobile Reply Comments”).

Rural Digital Opportunity Fund auction. In fact, if switching constraints are implemented, the auction could be completed within two to three weeks.

Nor will a limit on switching harm smaller bidders. As AT&T observes,<sup>13/</sup> smaller bidders will generally have specific local or regional interests. They therefore will likely have little desire to switch bids, let alone be materially impacted by a limit on switching, especially in later rounds of the auction. In contrast, a limit on switching will deter speculators, who will generally be indifferent to where and how much spectrum they acquire, from parking their bids and preventing sincere bidders from winning their intended targets.

AT&T's complaint that an SMR auction will mean a prolonged prohibited communications period that will deter participation continues to be meritless. As T-Mobile previously pointed out,<sup>14/</sup> the Commission has made clear that normal business discussions may occur during this time, and many bidders have successfully participated in auctions and conducted business while being subject to this rule. Indeed, as the Commission has recognized, the upcoming auction of 3.45 GHz band spectrum raises even more complex issues related to the prohibited communications rule than does the 2.5 GHz band auction.<sup>15/</sup> Yet, far from being deterred, several entities, including AT&T itself *and* entities that have requested bidding credits, have submitted applications to participate.<sup>16/</sup>

### ***The Alleged Benefits of a PAB-SRSB Auction are Inaccurate and Misleading***

AT&T claims that a PAB-SRSB auction is the better approach for the 2.5 GHz band because it “would give participants that attempt to bid against T-Mobile ‘a better opportunity to win,’ which will make them ‘more likely to participate.’”<sup>17/</sup> Even if there were any basis to AT&T's claim – and there is not – that is not a reason for the Commission to adopt a PAB-SRSB auction. The Commission should not be in the business of picking winners and losers. As AT&T and its consultants have previously recognized, the Commission's goal is not to enrich one competitor at the expense of others.<sup>18/</sup> And to the extent there are concerns about creating a competitive playing field, other mechanisms such as bidding credits are better able to help address those concerns.

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<sup>13/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 3.

<sup>14/</sup> See T-Mobile June 23, 2021 *Ex Parte* Letter at 3-4.

<sup>15/</sup> See *Guidance Regarding the Prohibition of Certain Communications During the Auction of Licenses in the 3.45-3.55 GHz Band (Auction 110)*, Public Notice, DA 21-859 (rel. July 20, 2021).

<sup>16/</sup> See *Auction of Flexible-Use Service Licenses in the 3.45-3.55 GHz Band for Next-Generation Wireless Services; Status of Short-Form Applications to Participate in Auction 110*, Public Notice, DA 21-999 (rel. Aug. 18, 2021).

<sup>17/</sup> AT&T Aug. 17, 2021 *Ex Parte* Letter at 2.

<sup>18/</sup> See Letter from David L. Lawson, Sidley Austin, Counsel for AT&T, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 and WT Docket No. 12-269, at Attach. at 1 (filed June 13, 2013) (“AT&T 600 MHz *Ex Parte* Letter”).

It is telling that prior to the 2.5 GHz band auction, AT&T routinely expressed support for an SMR auction.<sup>19/</sup> It likewise acknowledges now that an SMR auction and the price discovery it affords is a better approach for allocating new spectrum as compared to an SRSB auction.<sup>20/</sup> It is plain that AT&T has reversed its standpoint and supports a PAB-SRSB auction only because it seeks to hamstring T-Mobile by aiding speculators. But the Commission’s goal in this proceeding should be to ensure that the spectrum is obtained by those who value it most and will make the most efficient use of spectrum, which is precisely what T-Mobile intends to do for the licenses it might win.

Any perceived benefits related to the speed of a PAB-SRSB auction are also overstated.<sup>21/</sup> As T-Mobile explained,<sup>22/</sup> the time to prepare for a PAB-SRSB auction will consume significantly more time for bidders because they will be required to evaluate *all* possible bidding options against their business needs and include those various combinations in a single bid before the auction even begins. AT&T contends that because bidders have substantial experience in their markets, they can develop their bidding strategies accordingly.<sup>23/</sup> But requiring a bidder to include all potential bids in a single bid with no opportunity to course-correct still requires guessing. And a wrong guess could result in dire consequences – including the “winner’s curse” of overbidding, the inefficient distribution of spectrum, and even unsold licenses resulting in unserved areas. Moreover, substantial experience in an area does not mean that a bidder has substantial experience with the proposed PAB-SRSB auction format. In fact, they cannot. A PAB-SRSB auction remains a novel and untested proposal and will likely create significant bidder confusion.

The only class of bidders that a PAB-SRSB auction will serve is speculators. Because their only goal is to obtain spectrum that they can later sell, speculators are indifferent to where and how much spectrum they acquire, so long as their licenses are strategic in relation to other licensees. Their strategy for bidding is therefore different from the strategy of sincere bidders. Requiring sincere bidders to guess the strategy of speculators along with developing their own will produce lottery-like results with random winners and losers. And the parties that will ultimately be harmed are consumers as they wait for winning and losing bidders to, as AT&T’s consultants

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<sup>19/</sup> See, e.g., Comments of AT&T Services, Inc., AU Docket 18-85, at 3 (filed May 9, 2018) (stating that the FCC’s proposal for an SMR auction is “uncontroversial”); Reply Comments of AT&T, AU Docket No. 14-78, at 2 (filed June 23, 2014) (“The record in this proceeding demonstrates the wisdom of continuing the FCC’s tested and successful approach of conducting auctions using a simultaneous multiple-round (‘SMR’) auction format”); Comments of AT&T, AU Docket No. 14-78, at 1-2 (filed June 9, 2014) (“In the Public Notice, the Bureau has proposed to conduct Auction 97 using a simultaneous multiple-round (SMR) auction format with anonymous bidding. AT&T supports this format. The SMR format has been used successfully for two decades. Indeed, the wireless industry is extremely familiar with this format and has invested considerably in software, facilities, and personnel based on this model.”); Comments of AT&T Wireless Services, Inc., WT Docket No. 96-18, *et al.*, at 3 (filed Mar. 18, 1996).

<sup>20/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 1.

<sup>21/</sup> See *id.* at 2.

<sup>22/</sup> See T-Mobile Feb. 18, 2021 *Ex Parte* Letter at 5.

<sup>23/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 3.

have acknowledged, rationalize their holdings on the secondary market.<sup>24/</sup> Not only will this delay deployment, but it will also divert auction funds from the U.S. Treasury into the pockets of speculators. As AT&T's consultants have observed, "[a]n auction is meant to determine how best to allocate the scarce spectrum resource and to ensure that the Federal Government obtains a substantial share of the spectrum value."<sup>25/</sup> The best way to do that for the 2.5 GHz band is to implement an SMR auction format.

If the Commission adopts an SRSB auction format, it should adopt procedures to implement an SRSB with Vickrey pricing ("V-SRSB"). As T-Mobile explained,<sup>26/</sup> a V-SRSB auction promotes more truthful bidding, which leads to a more efficient auction compared to a PAB-SRSB auction. That is because whether and how much a bidder bids on a license depends on its understanding of how others value the license, which is unknown in an SRSB. In contrast to AT&T's suggestion that T-Mobile could win licenses at prices below its valuation in an SMR auction,<sup>27/</sup> a bidder could, as noted above, overpay for a license in a PAB-SRSB auction based upon incorrect guesses and assumptions. With Vickrey pricing, a bidder is not required to guess how its competitors may bid and form a strategy based on that guess. Instead, it can bid in a manner that optimizes its needs, ensuring that those that value the spectrum the highest will obtain the spectrum.

### ***The Commission Should Focus on Accurate Licensing Data Rather than Leasing Data***

Finally, AT&T urges the Commission to "address key information asymmetries" and "level the playing field" by obtaining and disclosing to bidders the relevant terms of lease arrangements between T-Mobile and incumbent licensees.<sup>28/</sup> But AT&T's real purpose in making the request is not to obtain information that would be useful in the 2.5 GHz band auction, but to secure access to competitively sensitive information. As T-Mobile explained,<sup>29/</sup> the only determining factor in an overlay auction is where the spectrum is *licensed* to an existing incumbent. A new licensee can provide service – the goal of obtaining spectrum – wherever it is not already licensed. The existence of *leases* and the terms and conditions of those leases do not provide that information.

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<sup>24/</sup> See AT&T 600 MHz *Ex Parte* Letter at Attach. at 23 ("Economic forces generally lead to assets being held by the users who value them most. If the highest-value user of a particular spectrum license were prevented from acquiring the license in an initial spectrum license auction, it should be expected to eventually acquire the license (or at least the ability to make use of the associated spectrum rights) from the auction winner through a later, secondary-market transaction.").

<sup>25/</sup> Reply Comments of AT&T, GN Docket No. 12-268 and GN Docket No. 13-185, at 10 (filed Jan. 23, 2014).

<sup>26/</sup> See T-Mobile Comments at 10; T-Mobile Feb. 18, 2021 *Ex Parte* Letter at 7.

<sup>27/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 2.

<sup>28/</sup> See *id.* at 3 (asking the Commission to require, among other things, the disclosure of the duration of the leases, whether there are rights of first refusal to renew the lease or purchase the incumbent's licenses, and lease termination provisions).

<sup>29/</sup> See T-Mobile June 23, 2021 *Ex Parte* Letter at 5-6.

Even if the leasing information provided useful data, AT&T’s request must be rejected as a late-filed petition for reconsideration of the rules governing leasing in general and governing the 2.5 GHz band in particular. The Commission rules governing leasing do not require the submission of lease agreements with lease applications or notifications. To the contrary, parties are required to “retain a copy of the spectrum leasing agreement and make it available upon request by the Commission.”<sup>30/</sup> The rules governing spectrum leasing do not contemplate the Commission making leasing agreements public; the purpose of requiring submission upon request to the Commission is to ensure compliance with the rules.<sup>31/</sup> Any change now would require a further rulemaking proceeding, unacceptably further delaying the public’s access to the use of the 2.5 GHz band for 5G services.

Putting aside the plain procedural flaw of AT&T’s request, it is also wrong when it argues that the Commission previously made available (subject to protective orders) highly competitively sensitive data from the industry in its Business Data Services proceeding.<sup>32/</sup> But in that proceeding, the sensitive information that was gathered and made available came from “the facilities of every provider of special access in price cap areas nationwide.”<sup>33/</sup> Here, AT&T is seeking information from only *one* provider: T-Mobile – an industry competitor and potential direct competitor in the upcoming auction.<sup>34/</sup> The Commission has never allowed, even through a protective order, confidential business information about a competitor in an auction. Indeed, AT&T’s request would violently undermine the purposes of the prohibited communications rule about which it is otherwise concerned by providing a window to likely bidding strategies. In contrast, the protective orders recently adopted for the C-band and 3.45 GHz band, which are more applicable to the circumstances here, related generally to information from relocating or remaining incumbents – not from a potential bidder that could reveal potential bidding strategies.<sup>35/</sup>

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<sup>30/</sup> 47 C.F.R. §§ 1.9020; 1.9030.

<sup>31/</sup> See *Promoting Efficient Use of Spectrum Through Elimination of Barriers to the Development of Secondary Markets*, Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 20604 (2003).

<sup>32/</sup> See AT&T Aug. 17, 2021 *Ex Parte* Letter at 3-4 (citing *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) (“*Data Collection Protective Order*”).

<sup>33/</sup> *Data Collection Protective Order* ¶ 18.

<sup>34/</sup> That is not surprising as AT&T has a history of attempting to obtain competitively sensitive data from T-Mobile and others. See generally Comments of AT&T Services, Inc., AU Docket No. 20-429 (filed May 3, 2021); see also, e.g., Letter from Brian J. Benison, Director, Federal Regulatory, AT&T Services, Inc., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120, at 1 (filed June 28, 2019) (making an unjustified, and ultimately rejected, request that the Commission require Sprint, and other Education Broadband Service licensees and lessors, to provide confidential technical information about its current and future deployments in the 2.5 GHz band and private contracts related to leased spectrum in the band).

<sup>35/</sup> See *Expanding Flexible Use of the 3.7-4.2 GHz Band, et al.*, Protective Order, 34 FCC Rcd 7700 (2019) (“*C-band Protective Order*”); *Auction of Flexible-Use Service Licenses in the 3.45-3.55 GHz Band (Auction 110)*, Protective Order, DA 21-1026 (rel. Aug. 20, 2021).

More generally, the Commission has routinely recognized the importance of limiting even further access to certain highly confidential information. For instance, in the Business Data Services proceeding, the Commission made clear that highly confidential information and data, including the terms and conditions of certain contracts, should be insulated from the competitive decision-making parties and activities of any entity in competition with or in a business relationship with the submitting party.<sup>36/</sup> That is exactly the case with T-Mobile’s leasing information. There is simply no reason or support for requiring T-Mobile to disclose leasing information.

However, T-Mobile agrees with AT&T that the Commission should “establish an accurate inventory of unencumbered spectrum in each of the overlay license products.”<sup>37/</sup> As the Commission is aware, several parties, including T-Mobile, have already provided substantial information on the record to aid the Commission in updating its licensing database.<sup>38/</sup> More accurate information about the licenses that will be made available will make for more informed decision-making and address the concerns about asymmetries raised by AT&T.

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Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter has been submitted in the record of the above-referenced proceedings. If there are any questions concerning this matter, please contact the undersigned directly.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
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<sup>36/</sup> See *Data Collection Protective Order* ¶ 5; *id.* ¶ 23 (“Access to Highly Confidential Information and Highly Confidential Data is limited to Outside Counsel and Outside Consultants and their employees who are not involved in the Competitive Decision-Making activities of a competitor of a Submitting Party or a person with whom the Submitting Party does business.”); see also *C-band Protective Order* ¶ 1 (limiting more strictly “access to certain particularly competitively sensitive information, which, if released to competitors or those with whom the Submitting Party or a Third-Party Interest Holder does business, would allow those persons to gain a significant competitive advantage or an advantage in negotiation”).

<sup>37/</sup> AT&T Aug. 17, 2021 *Ex Parte* Letter at 4.

<sup>38/</sup> See T-Mobile Comments at Appendices 1-5; T-Mobile Reply Comments at Appendix 1, Revised Appendix 5.



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