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Comments on Auction 105

October 30, 2019

Commission's Secretary, Office of the Secretary, Federal Communications Commission
445 12th Street,
SW, Washington, DC 20554

DA/FCC #: FCC-19-96

Docket/RM: 19-244

RE: Commission seeks comment on the procedures to be used for auction of Priority Access Licenses in the 3550-3650 MHz band, scheduled to begin on June 25, 2020

Dear FCC,

Please address the following comments regarding upcoming Auction 105:

1. In most, if not all of the FCC Auctions, the most common bidding strategy used by bidders is not challenge the "provisional winner" during the entire duration of the round and instead increase their bid the last 5 seconds. I discovered that by continuing to reload the page showing bid value and provisional winner all the way until the last second and it shows me as the provisional winner then when the round closes, another name appears as the actual winner! Furthermore; they will let you win the second to last round of the day (actual winner) but they will challenge you the very last 5 seconds of the last round to make sure they are the winners. I tried to play that game by increasing my bid the last 3 seconds and submitting before the last second (even though I was the provisional winner) but someone else would win as if they had cracked the code to make sure your server takes in their bid the last 3 seconds and not mine. If you address this issue, then an auction will function the proper way and people will continue to bid throughout the round, and you will make significantly larger revenue in a fair environment. Please address.
2. If you break the FM license in larger metropolitan areas (Los Angeles, New York...etc) into small areas with lesser upfront payment you will engage many more bidders and small business firms. Please consider, if not for Auction 105 for other ones.

Sincerely!

Omar Affeh, PE
(702)752-1413
Universal Electrical Contractors

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