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November 15, 2019

Via ECFS

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

Re: Notice of Oral Ex Parte Communication

AU Docket No. 19-244, *Auction of Priority Access Licenses for the 3550-360 MHz Band*
GN Docket No. 17-258, *Promoting Investment in the 3550-3700 MHz Band*

Dear Ms. Dortch:

On November 13, John Hunter and Michael Amend (by telephone) of T-Mobile USA, Inc. (“T-Mobile”),^{1/} Russell Fox and Angela Kung of Mintz, and I met with Matthew Pearl, Jessica Quinley, and Becky Schwartz (by telephone) of the Wireless Telecommunications Bureau and Margaret Wiener, Martha Stancill, Jonathan Campbell, and Mary Lovejoy of the Office of Economics and Analytics regarding the above-referenced proceedings.

We expressed our appreciation of the Commission’s efforts to make the 3550-3650 MHz band available for commercial wireless use through the upcoming auction of Priority Access Licenses (“PALs”). We asserted that the Commission should not allow bidding for PALs at the Cellular Market Area (“CMA”) level *and* at the county level in the same geographic areas. Not only would permitting a mix of CMA-level bidding and county-level bidding in the same geographic areas perpetuate the interference protection problems identified by the Commission and complicate adjacent-channel coordination, but it would also likely result in unsold licenses.

Instead, we urged the Commission to permit bidding *only* on a CMA-level basis for top multiple-county CMAs; in particular, we reiterated our support for the Commission’s proposal to permit CMA-level bidding in the 172 CMAs that are considered Metropolitan Statistical Areas (“MSAs”) and that include more than one county. Nevertheless, to address the desire by some parties to obtain single-county licenses in rural areas, the Commission may alternatively wish to consider permitting CMA-level bidding – and CMA-level bidding only – in the *top 50* CMAs

^{1/} T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

that are considered MSAs and that include more than one county. However, if the Commission declines to adopt CMA-level bidding only, in either the top 50 CMAs or the top 172 CMAs, T-Mobile agrees with others that the Commission should adopt county-level bidding only.

Finally, we urged the Commission to ensure that the auction proceeds at a rapid pace, including by increasing the number of bidding rounds early in the auction and utilizing a high initial clock price increment of 10 percent. And we urged the Commission to reject NTIA's assertion that the Commission must establish a reserve price based on "sharing costs" incurred by Federal entities operating in the 3550-3650 MHz band.

Pursuant to Section 1.106 of the Commission's rules, a copy of this letter has been submitted in the record of the above-referenced proceedings and copies have been sent to the members of the Commission's staff with whom we met. If there are any questions regarding the foregoing, please contact the undersigned.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey
Vice President, Government Affairs
Technology and Engineering Policy

cc: (each by e-mail)
Matthew Pearl
Jessica Quinley
Becky Schwartz
Margaret Wiener
Martha Stancill
Jonathan Campbell
Mary Lovejoy