



November 6, 2014

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through
Incentive Auctions, GN Docket No. 12-268
Notice of Oral Ex Parte Communication*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, this letter provides notice that on November 4, 2014, Jim Gottlieb of Capitol Counsel LLC and I met with FCC Commissioner Jessica Rosenworcel and her Policy Director Clint Odom to discuss issues in the above-referenced docket. Specifically, we noted our appreciation for the efforts that the Incentive Auction Task Force have made to provide information on a timely and transparent basis to prospective participants in the upcoming reverse auction. We noted that continued transparency by the Commission is needed to maximize broadcaster participation in the reverse auction, but also cautioned against adding complexity to the auction process that could deter broadcaster participation. Examples of complexities that could have unintended consequences are the formulas that are under consideration by the Commission for use in determining bid offers that the Commission will make in the reverse auction, as well as the concept of "dynamic reserve prices."

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William D. deKay", is written over a horizontal line.

William D. deKay
Chief Executive Officer and Co-Founder
LocusPoint Networks, LLC

cc: Commissioner Jessica Rosenworcel
Clint Odom