



601 Pennsylvania Ave., NW
Suite 800
Washington, DC 20004
202-654-5900

November 20, 2014

VIA ELECTRONIC FILING

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

**Re: *Expanding the Economic and Innovation Opportunities of Spectrum
Through Incentive Auctions, GN Docket No. 12-268***
Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269
***Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers and
Other Providers of Mobile Data Services, WT Docket No. 05-265***

Dear Ms. Dortch:

On November 18, 2014, Andrew Levin, Senior Vice President of Government Affairs at T-Mobile USA, Inc. (T-Mobile);¹ Kathleen Ham, Vice President of Federal Regulatory Affairs at T-Mobile; and Trey Hanbury of Hogan Lovells US LLP (representing T-Mobile) met with Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn.

As explained in the attached slides, a four-block maximum reserve would promote competition and expand opportunity by preventing the dominant players, which already control more than 70% of the nation's low-band spectrum resources, from choking off competitors' access to the spectrum resources needed to offer wireless services indoors and in rural areas. By comparison, incorporating an artificial "revenue" prong to the minimum purchase price on top of multi-billion dollar baseline expenses associated with the 600 MHz auction would only increase the risk of anti-competitive foreclosure, reduced broadband spectrum clearing, and lower broadcaster revenues.

T-Mobile also discussed the Commission's Data Roaming Order and the "commercially reasonable" standard for data roaming agreements adopted therein. As set forth in T-Mobile's petition for declaratory ruling, prospective guidance and predictable enforcement criteria on the "commercially reasonable" standard would be invaluable to carriers in negotiating and reaching agreements.

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

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 docket. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President, Federal Regulatory Affairs