



Joan Marsh
Vice President –
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036

202.457.3120 Phone
832.213.0172 Fax
joanmariemarsh@att.com

December 3, 2014

EX PARTE VIA ECFS

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

**Re: Expanding the Economic and Innovation Opportunities of Spectrum through
Incentive Auctions, GN Docket No. 12-268**

Dear Ms. Dortch:

On Monday, December 1, 2014, I met separately with Erin McGrath, Legal Advisor to Comm. O’Rielly, Brendan Carr, Legal Advisor to Comm. Pai and David Goldman, Legal Advisor to Comm. Rosenworcel. In each meeting I discussed my understanding of the auction PN that is currently pending for a vote. More specifically, I noted that some of the proposals in the PN appear designed to put interference burdens disproportionately and unfairly on the non reserve blocks, and thus on the non reserve-eligible bidders. I specifically questioned the proposed definitions for Category 1 and Category 2 licenses and argued that the Commission should seek comment on how to manage impairments before drawing any conclusions about how impairments should be assigned to specific blocks during the auction. I also noted that the Commission should seek further comment before drawing any conclusions on the level of permissible aggregate impairments within a nationwide band plan.

I also expressed concern about any broadcaster scoring proposal that is based on population covered. I noted that AT&T continues to support the scoring of stations participating in the auction, if that is necessary, only on interference. A simple and straight-forward scoring approach will attract greater broadcaster participation and absent sufficient participation there will be no spectrum to sell.

December 3, 2014

In accordance with the Commission's rules, this letter is being filed electronically with the Secretary for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'JM', with a long horizontal line extending to the right.

Joan Marsh

cc: Erin McGrath
Brendan Carr
David Goldman