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December 19, 2014

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte Notice***  
*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*

Dear Ms. Dortch:

On December 17, 2014, Kathleen Ham and Steve Sharkey of T-Mobile USA, Inc. (T-Mobile),<sup>1</sup> Gregory Rosston (by phone), consultant to T-Mobile, and Trey Hanbury of Hogan Lovells US LLP, counsel to T-Mobile, met with Renee Gregory, Legal Advisor to Chairman Tom Wheeler.

T-Mobile and its representatives discussed the attached slides. In particular, T-Mobile discussed the importance of low-band spectrum in providing robust coverage in urban and rural areas, and the importance of the spectrum reserve towards promoting competition in the incentive auction. T-Mobile presented its proposal for increasing the size of the spectrum reserve from three blocks to four. Expanding the reserve would ensure that the two dominant carriers will be forced to compete with one another in the auction and that sufficient blocks will exist for two non-dominant carriers to acquire spectrum sufficient to compete nationally against the two dominant providers. T-Mobile also reiterated its position that use of the revenue test (a minimum average price per MHz-POP per unit of spectrum sold) in the incentive auction creates the risk of anti-competitive foreclosure, reduced participation in the forward and reverse auctions, reduced spectrum clearing for wireless broadband, and lower auction revenues.

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

Respectfully submitted,

*/s/ Trey Hanbury*

Trey Hanbury  
Counsel to T-Mobile USA, Inc.

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