



**Rafi Martina**  
Legal and Government Affairs  
[Rafi.Martina@sprint.com](mailto:Rafi.Martina@sprint.com)  
(571) 287-8136

Sprint Corporation  
900 7th Street, NW  
Suite 700  
Washington, DC 20001

April 7, 2015

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

Re: ***Notice of Ex Parte Presentation:***  
*Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, AU Docket No. 14-252; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268*

Dear Ms. Dortch:

On April 3, 2015, representatives of Sprint Corporation (“Sprint”) participated in a telephone conference with Federal Communications Commission staff members regarding the above-captioned proceedings. Participating on the call from Sprint were Richard Engelman, Ray Taylor, Samuel Nicholson, and Rafi Martina, as well as Dr. David Salant, Dr. Gregory Attiyeh, and Robert Gehman, consultants to Sprint. Participating on the call from the Commission were Melissa Dunford, Chris Helzer, AJ Glusman, Karla Hoffman, Jonathan McCormack, Sasha Javid, Rudy Sultana, Tony Coudert, Jonathan Campbell, and Brian Smith.

During the meeting, the parties discussed the Commission’s Public Notice soliciting comment on competitive bidding procedures for the auction.<sup>1</sup> In particular, Sprint posed questions to Commission staff regarding the proposed “clearing target optimization procedure” by which the Commission will determine the spectrum clearing target and final TV channel assignments (including assignments potentially within the future 600 MHz band). Assignment of television stations within the future 600 MHz band (and the resulting impairments to mobile broadband frequencies) will seriously impact the utility and desirability of auctioned 600 MHz blocks. As Sprint has observed, the extent of these impairments is masked both by the Commission’s use of the F(50,50) statistical measure to predict potential interference, as well as by broad bidding categories encompassing blocks with highly dissimilar impairments.

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<sup>1</sup> *Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, Public Notice, AU Docket No. 14-252, GN Docket No. 12-268, 29 FCC Red 15750 (2014) (“Comment Public Notice”).*

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Sprint shares the concern common among prospective forward auction participants that aspects of the proposed auction design associated with the treatment of impairments engender considerable forward auction uncertainty. The Commission can reduce this uncertainty, and in so doing increase the likelihood of auction success and post-auction competition, by refining its auction procedures to reduce overall impairment levels while ensuring a sufficient amount of unimpaired spectrum exists to promote intensive and efficient deployment by multiple operators including, in particular, competitive carriers. Sprint looks forward to working with Commission staff to build upon the ‘basic framework’ of the *Incentive Auction Order* to balance the objectives for a band plan that produces both *ample* and *relatively unimpaired* spectrum for forward auction bidders.

Pursuant to Section 1.1206 of the Commission’s rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

*/s/ Rafi Martina*

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Rafi Martina

Counsel

Legal and Government Affairs

Sprint Corporation

cc: (via e-mail)

Melissa Dunford

Chris Helzer

AJ Glusman

Karla Hoffman

Jonathan McCormack

Sasha Javid

Rudy Sultana

Tony Coudert

Jonathan Campbell

Brian Smith