



## Iowa Utilities Board

Governor Terry E. Branstad  
Lt. Governor Kim Reynolds

Elizabeth S. Jacobs, Chair  
Nick Wagner, Board Member  
Sheila K. Tipton, Board Member

April 28, 2015

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

### EX PARTE COMMUNICATION

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

Dear Chairman Wheeler:

The Iowa Utilities Board (Board) files this letter in support of the recommendations of the National Association of State Utility Consumer Advocates (NASUCA) as outlined in its March 19, 2015, ex parte letter.

As a state with many rural areas, we are concerned that without adequate safeguards in place, smaller competitors will be unable to fairly compete for spectrum leaving behind consumers in many of our unserved and/or underserved areas. Currently, AT&T and Verizon Wireless, the two largest wireless carriers, control a majority of low-frequency spectrum.<sup>1</sup> Increased concentration of this low-band spectrum will result in fewer choices for consumers placing the rural markets in jeopardy. Ultimately, the greatest harm would be to the consumer, precisely the opposite effect of the Federal Communications Commission's (Commission) intended goal.

The Board supports robust competition and encourages the Commission to ensure that the smaller wireless competitors have a fair opportunity to acquire spectrum in this valuable asset. Consumers should have access to as many providers as possible. Preserving robust competition in the wireless market will benefit consumers by offering more choices, lower prices, higher quality, and more reliable services. Therefore, we urge the Commission to move forward as

<sup>1</sup> See WT Docket No. 13-135, 17<sup>th</sup> Mobile Competition Report, DA 14-1862 (rel. Dec. 18, 2014) at ¶¶ 104-106.

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planned with the 600MHz broadcast incentive auction while ensuring that adequate safeguards are in place to allow the non-dominant carriers equal opportunity in the bidding process.

The Commission has a unique opportunity to significantly alter the future dynamic of wireless service. We support NASUCA's recommendations to proceed with the 600 MHz broadcast incentive auction, by increasing the size of the spectrum reserve, and by encouraging more facilities-based wireless competition as recommended by NASUCA.

In closing, the Board would like to thank the Commission for its work and commitment to promote robust and innovative wireless services in rural America.

Respectfully,

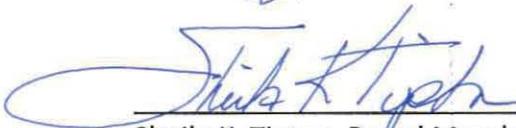
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cc: Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Mr. Charles Acquard, Executive Director, NASUCA