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The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Re: Comment on GN Docket 12-268

Dear Chairman Wheeler and Commission Members:

We strongly support the Commission's Incentive Report and Order adopting auction rules for repurposing 600 MHz band 1 frequencies for the following reasons:

1. The trend for the public receiving its voice and video media via the Internet and mobile platforms and less by over the air broadcast continues strong. Surveys are updated weekly confirming this trend, particularly among the younger fastest growing demographic groups.
2. There continues to be a shortage of usable bandwidth for mobile operators. Although the Commission has made substantial progress in re-allocating underused spectrum, the increasing public demand for mobile content continues strong.
3. Mobile carriers continue to upgrade their networks to meet these continuing demands, and find available spectrum with favorable propagation characteristics difficult to secure. This requires more sites for higher bandwidths, exacerbating the difficulty of securing local entitlements.
4. Mobile data platforms are increasingly becoming the standard for major institutions and public safety agencies effectively reaching their constituents.
5. While the mobile sector has generally provided *coverage* within its market areas using the original 800 MHz, later 1800-1900 PCS and more recent 2 GHz spectrum, *capacity* remains a significant obstacle to our industry providing the level of service the public demands.

Our firm provides deployment services to mobile operators, including site design, identification and evaluation, leasing, compliance and securing local jurisdictional entitlements. In this capacity we are closely attuned to the needs of carriers, their customers and local jurisdictions. Our carrier clients continually ask for more bandwidth, customers for faster and more reliable connections and handoffs, and jurisdictions for more visually appealing sites. Nearly all jurisdictions with which we interact require stealthing of new or upgraded facilities. This becomes increasingly challenging for larger "macro" sites.

Chairman Wheeler

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Making available even a minimal segment of 600 MHz spectrum will enable smaller less intrusive sites in urban areas to meet this capacity demand.

Further, we support the concept of providing auction credits to second tier carriers to enable them to upgrade their networks to competitive standards.

Thank you for your consideration.

Sincerely,

John T. Merritt