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Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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 May 28, 2015, representatives of Sprint Corporation (“Sprint”) met with Federal Communications Commission staff members regarding the above-captioned proceedings. A complete list of individuals participating in the meeting is attached as Exhibit 1.

Sprint has been active in the Commission’s Incentive Auction proceeding from the outset, encouraging the Commission to develop a clearing target optimization approach that provides a balanced response to two primary goals: 1) maximize the amount of bi-directional spectrum that can be auctioned for commercial use by multiple competitors; and 2) improve bidder certainty by reducing the variability of impairment levels in spectrum blocks auctioned in the same category. In the context of the Commission’s ongoing proceeding, Sprint has in particular noted the concern among prospective forward auction participants with the effects of substantial (and varying) impairments on block utility and fungibility, as well as on bidder certainty and confidence.¹

During the meeting, the parties discussed the Public Notice recently released by the Incentive Auction Task Force, inviting interested parties to comment on staff simulations of the

¹ *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 Rcd 15750 (2014) (“Comment Public Notice”).*

initial clearing target optimization procedures proposed in this proceeding.² Sprint posed questions to FCC staff regarding the procedures and data released in the Public Notice. Sprint representatives expressed their appreciation for the efforts by Commission staff to develop the framework for the Incentive Auction. Sprint considers the simulations and data contained in the recently-released Public Notice an important step in focusing the record in the above-captioned proceeding towards refinements that will maximize spectrum availability while improving bidder certainty and reducing impairments.

Sprint looks forward to working with Commission staff to build upon the ‘basic framework’ of the *Incentive Auction Order*. By reducing forward auction uncertainty generated from underlying impairments to auctioned spectrum and refining associated auction procedures to increase bidder confidence, as well as maintaining sufficient spectrum within the 600 MHz initial band plan, the Commission can substantially improve upon the Incentive Auction structure and better enable effective, rapid, and competitive deployment of 600 MHz spectrum post-auction.

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

Rafi Martina

Counsel

Legal and Government Affairs

Sprint Corporation

cc: (via e-mail)
Gary Epstein
Howard Symons
Martha Stancill
Bill Scher
Melissa Dunford
Jennifer Tomchin
Joel Taubenblatt
Matthew Hussey
James Wiley
Sasha Javid
Kate Matraves
Madelaine Maior
Karen Sprung
Jonathan Campbell

² Public Notice, *Incentive Auction Task Force Releases Initial Clearing Target Optimization Simulations*, AU Docket No. 14-252, GN Docket No. 12-268 (May 20, 2015) (“Public Notice”).

Exhibit 1

Meeting Participants

Sprint Corporation

Lawrence R. Krevor, Vice President, Legal and Government Affairs – Spectrum
Richard B. Engelman, Director, Legal and Government Affairs
Rafi Martina, Counsel, Legal and Government Affairs
David J. Salant, PhD, Toulouse School of Economics and Auction Technologies, Inc. – Consultant to Sprint
Gregory Attiyeh, PhD, FTI Consulting – Consultant to Sprint
Robert Gehman, Consulting Engineer, Kessler and Gehman Associates – Consultant to Sprint
Regina M. Keeney, Lawler, Metzger, Keeney & Logan, LLC – Counsel to Sprint
Charles W. Logan, Lawler, Metzger, Keeney & Logan, LLC – Counsel to Sprint

FCC

Incentive Auction Task Force

Gary Epstein
Howard Symons
Melissa Dunford
Bill Scher
Sasha Javid
Kate Matraves

Office of Engineering & Technology

Matthew Hussey

Public Safety and Homeland Security

James Wiley

Wireless Telecommunications Bureau

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Joel Taubenblatt
Madelaine Maior
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