

June 24, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions; Comment Sought on Defining Commencement of Operations in the 600 MHz Band* (GN Docket No. 12-268); *Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002* (AU Docket No. 14-252); *Office of Engineering and Technology Seeks to Supplement the Incentive Auction Proceeding Record Regarding Potential Interference Between Broadcast Television and Wireless Services* (ET Docket No. 14-14); *Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap* (ET Docket No. 14-165); *Promoting Spectrum Access for Wireless Microphone Operations* (GN Docket No. 14-166)

Dear Ms. Dortch,

On June 22, 2015, Scott Bergmann and Krista Witanowski of CTIA – The Wireless Association® (“CTIA”), together with CTIA members (“collectively the Wireless Industry Representatives”), met with Chairman Tom Wheeler and his staff and representatives of the Commission’s Incentive Auction Task Force, Office of Engineering and Technology, Wireless Telecommunications Bureau, Media Bureau, and International Bureau to discuss issues in the above-captioned proceedings. A full list of meeting attendees is included below.

CTIA explained that the incentive auction represents a once-in-a-lifetime opportunity for the Commission to make available much-needed spectrum for mobile broadband use. As the Commission finalizes its procedures and rules governing the incentive auction, CTIA urged the Commission to consider several key goals. First, the auction should have clear rules and procedures that will encourage interested broadcasters to participate with confidence. Second, it should clear as much spectrum as possible for new licensed wireless services in the 600 MHz band. Third, it should provide forward auction bidders with the information to make informed choices regarding future spectrum investments. And finally, a successful incentive auction should result in the auctioning of wireless licenses that are minimally impaired and can be productively used by wireless licensees.

CTIA reiterated its call for the development of an impairment cap that would better ensure a near-nationwide band plan for the 600 MHz band. CTIA noted that, while a certain degree of impairment to 600 MHz licenses is inevitable, the Commission’s originally-proposed

20 percent threshold would result in significant impairment and as such this standard should be revisited. The Commission's recent *Auction Simulation Public Notice* is a positive step in this regard as it produced robust near-nationwide band plans with lower nationwide impairment based on a sliding impairment scale. In general, the Commission should strive to minimize impairments while balancing this with a need to maximize the amount of spectrum recovered.

In addition, CTIA stressed that the Commission should provide forward auction bidders the time and data necessary to make informed decisions that reflect their individual spectrum needs and strategies. First, CTIA urged the Commission to provide sufficient inter-service interference data, including detailed information on the television stations causing potential interference. Providing robust information to interested bidders will help them make informed decisions regarding spectrum assets and increase the likelihood of a successful auction. CTIA noted the importance of providing access to such information in an easily-accessible format and early enough in the process that bidders will be able to make informed decisions. In addition, the Commission should ensure that its proposals do not sacrifice informed decision-making in favor of auction speed. Finally, the Commission should adopt activity rules that accommodate the needs of bidders and do not unduly burden them as they make key decisions regarding their auction participation.

Finally, CTIA commended the Commission on its efforts to minimize the complexity of the auction overall, and explained the importance of providing bidders in the forward auction with certainty regarding their rights to timely and effective access to spectrum won at auction. Actions that create undue complexity for forward auction bidders have the potential to depress bidding and undermine the Commission's and Congress's goal of reallocating additional spectrum for mobile broadband services. CTIA urged the Commission to provide future licensees with the necessary assurances that their operations will be fully protected from harmful interference, and to reduce unnecessary regulatory burdens placed on 600 MHz wireless licensees that may hinder their expeditious access to spectrum.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS. Please direct any questions to the undersigned.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs
CTIA – The Wireless Association®

Attachment
June 22, 2015 Meeting Participants

CTIA – The Wireless Association®

Scott Bergmann, Vice President, Regulatory Affairs, CTIA

Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA

CTIA Member Company Representatives

Richard Engelman, Sprint

Larry Krevor, Sprint

Steve Sharkey, T-Mobile

Grant Spellmeyer, U.S. Cellular

Kathleen Grillo, Verizon

Federal Communications Commission – Office of Chairman Wheeler

Tom Wheeler, Chairman

Ruth Milkman, Chief of Staff

Renee Gregory, Legal Advisor

Federal Communications Commission – Incentive Auction Task Force

Gary Epstein, Chairman

Howard Symons, Vice Chair

William Scher

Federal Communications Commission – Office of Engineering and Technology

Julius Knapp, Chief

Federal Communications Commission – Wireless Telecommunications Bureau

Roger Sherman, Chief

Chris Helzer, Chief Engineer

Federal Communications Commission – Media Bureau

Joyce Bernstein

Federal Communications Commission – International Bureau

Mindel De La Torre, Chief