



June 25, 2015

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

Re: United States Cellular Corporation

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through
Incentive Auctions, GN Docket No. 12-268 and AU Docket No. 14-252

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceedings. On June 23, 2015, as part of a larger industry group meeting, the undersigned met for a second consecutive day with FCC Chairman Tom Wheeler accompanied by the following FCC staff: Ruth Milkman, Renee Gregory, Gary Epstein, Howard Symons, Julie Knapp, Roger Sherman, Jim Schlichting, Chris Helzer, William Scher, and William Lake.

During the course of meeting, U.S. Cellular expressed continued support for its previously filed joint proposal with T-MOBILE to have the Commission adopt an assignment phase mechanism which would involve the use of a nonmonetary mechanism for bidders to express license preferences. Adoption of such a mechanism would eliminate the otherwise very real risk of a failure of the forward auction caused by bidders withholding monetary bids during the clock phase of the forward auction in an effort to conserve money for a potentially costly assignment phase. Use of a draft structure is also simpler for bidders to administer due to the relative ease of ranking markets as opposed to assigning dollar values to each market.

An assignment phase where smaller competitive carriers are systematically outbid and relegated to higher impaired blocks of spectrum also risks injuring the competitive wireless industry. We also stressed the fact that non-national carriers lack the ability to run sophisticated auction bidding "war rooms" necessary to effectively compete in an assignment phase involving monetary bidding.

Our proposal for an NFL style draft selection of licenses avoids the potential for a failure of the forward auction to achieve the revenue necessary to close the auction at an appropriately high clearing target and ensures all bidders an opportunity to prioritize markets of importance to them during the assignment phase.

Sincerely,

/S/

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