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June 25, 2015

Via Electronic Filing

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

Re: AU Docket No. 14-252; GN Docket No. 12-268; WT Docket No. 12-269;
WT Docket No. 14-170
Ex Parte Notice

Dear Ms. Dortch:

On June 23, 2015, Lawrence R. Krevor, Vice President, Legal and Government Affairs – Spectrum at Sprint Corporation (“Sprint”), Richard B. Engelman, Director, Legal and Government Affairs at Sprint, Rafi Martina, Counsel, Legal and Government Affairs at Sprint, and I met separately with Renee Gregory, Legal Advisor to Chairman Tom Wheeler; Chanelle Hardy, Chief of Staff and Media Legal Advisor to Commissioner Mignon Clyburn, Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn, and Misha Guttentag, Legal Intern, Office of Commissioner Clyburn; and Brendan Carr, Legal Advisor to Commissioner Ajit Pai, regarding the above-referenced proceedings. During the meetings, Sprint’s representatives urged the Commission to maximize the 600 MHz spectrum available for competitive carriers and competitive entry and reduce uncertainty about impairments in the incentive auction.

Sprint commended the Commission for seeking to strike a balance between reducing uncertainty and variation among licenses with maximizing the amount of repurposed spectrum. To determine if uncertainty could be further reduced, Sprint suggested that the Commission explore whether the range of impairment within categories could be narrowed further, *e.g.*, 0 to 10% in Category 1 and 11-30% in Category 2, while still yielding at least an 84 MHz near-nationwide band plan with a high quantity of Category 1 spectrum in at least the top 30 markets.

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Sprint's representatives also discussed Sprint's proposal that the Commission establish, and allow eligible bidders to bid on, reserve blocks from the start of the auction. As Sprint has detailed in its filings, triggering reserve block bidding only after the two-part "Final Stage Rule" is met could undercut the full availability of reserve spectrum to reserve-eligible bidders, and thereby permit bidding strategies designed to prevent a greater distribution of low-band spectrum among competitive wireless broadband providers. This is particularly important to enhancing sustainable wireless broadband competition, because two carriers already control more than 80 percent of the currently available low-band spectrum in the nation's largest markets. In addition, Sprint expressed its opposition to barring joint bidding arrangements among nationwide providers.

Pursuant to section 1.1206(b) of the Commission's rules,¹ this letter is being submitted for inclusion in the public record of the above-referenced proceedings.

Sincerely,

/s/ Regina M. Keeney
Regina M. Keeney

cc: Renee Gregory
Chanelle Hardy
Louis Peraertz
Brendan Carr
Misha Guttentag

¹ 47 C.F.R. § 1.1206(b).