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June 29, 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 25, 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, Gardner Foster, Senior Counsel, Legal and Government Affairs, Rafi Martina, Counsel, Legal and Government Affairs at Sprint, and I met separately with Valery Galasso, Policy Advisor to Commissioner Jessica Rosenworcel, and Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly, regarding the above-referenced proceedings. During the meetings, Sprint’s representatives urged the Federal Communications Commission (“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.

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% of the currently available low-band spectrum in the nation's largest markets. Sprint also urged that, in markets where there are only a limited number of Category 1 blocks available in the forward auction, the spectrum be divided evenly between reserved and unreserved blocks rather than limiting the reserved spectrum to as little as 10 megahertz.

Sprint's representatives commended the Commission for prioritizing spectrum contiguity for future 600 MHz licensees. Sprint also addressed the timetable for re-packing broadcast licensees, and urged that the Commission enforce the deadlines that it adopts for that process. Finally, 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/ Stephen J. Berman

Stephen J. Berman

cc: Valery Galasso
Erin McGrath

¹ 47 C.F.R. § 1.1206(b).