



JOHN T. SCOTT, III
VP & Deputy General Counsel

1300 I Street, N.W.
Suite 400-West
Washington, DC 20005

Phone: (202) 515-2412
Fax: (202) 289-6781
john.scott@verizon.com

Ex Parte

July 6, 2015

Ms. Marlene Dortch
Secretary
Federal Communications Commission
455 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, AU Docket No. 14-252; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269; Updating Part 1 Competitive Bidding Rules, WT Docket No. 14-170

Dear Ms. Dortch:

On July 1, 2015, Tamara Preiss, Charla Rath, and John Scott of Verizon met with Commissioner Michael O’Rielly and Erin McGrath, Legal Advisor to the Commissioner. Accompanying the Verizon representatives was Jacqueline Reingold, an intern at Verizon. We also met separately with Valerie Galasso, Policy Advisor to Commissioner Jessica Rosenworcel. We had a third meeting with Matthew Berry, Chief of Staff for Commissioner Ajit Pai, Brendan Carr, Legal Advisor, and Ben Sunshine, an intern in Commissioner Pai’s office. We discussed the same above-referenced proceedings in each of these meetings.

We first discussed T-Mobile’s petition for reconsideration of the Commission’s May 2014 Report and Order. Consistent with Verizon’s previous filings,¹ we stated that there is no factual or legal basis for the Commission to consider T-Mobile’s request to increase the 30 MHz spectrum set aside. To the contrary, as Verizon has said before, there is a stronger case for eliminating the set aside than increasing it.

¹ See, e.g., Opposition of Verizon to Petitions for Reconsideration, WT Docket No. 12-269, filed September 24, 2014; Letter to Marlene Dortch from Kathleen Grillo, GN Docket No. 12-268 and WT Docket No. 12-269, filed June 16, 2015.

Letter to Marlene Dortch

July 6, 2015

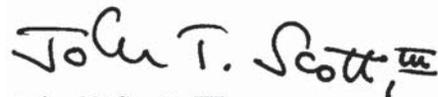
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We then discussed procedures for the upcoming incentive auction. As we explained in our comments,² there are actions the Commission can take to promote simplicity and thus encourage participation in the forward auction. First, the Commission should increase the fungibility of licenses offered in the forward auction by adopting a near-nationwide clearing target that minimizes impairments to wireless licenses from broadcast stations. Second, the Commission should place relocated broadcast stations only in the uplink band and not in the downlink band or duplex gap. Third, given that this will be the first ever incentive auction, the Commission should release bidder packages, file formats and other information as soon as possible. Fourth, we emphasized the benefits of enabling winning bidders to secure contiguous licenses in the assignment round of the auction.

Finally, we discussed the pending rulemaking proceeding on the Commission's designated entity and general competitive bidding rules. Consistent with Verizon's comments,³ we noted our support for changes to those rules that would prohibit joint bidding agreements, except where two or more applicants form a joint venture or consortium to bid through a single applicant. We also supported narrowing the situations in which an applicant is deemed to be a former defaulter due to non-payment of a debt owed to the federal government.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive style with a small "III" at the end.

John T. Scott, III

cc: Commissioner Michael O'Rielly
Erin McGrath
Valerie Galasso
Matthew Berry
Brendan Carr
Ben Sunshine

² Comments of Verizon, AU Docket No. 14-252, GN Docket No. 12-268, filed February 20, 2015; Reply Comments of Verizon, AU Docket No. 14-252, GN Docket No. 12-268, filed March 13, 2015.

³ See Reply Comments of Verizon, WT Docket No. 14-170, filed May 21, 2015.