



**NATIONAL ASSOCIATION OF NEIGHBORHOODS**

June 24, 2015

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: GN Docket No.12-268, WT Docket No.12-269, AU Docket No.14-252

End the Spectrum Drought – No More Gimmicks!

The National Association of Neighborhoods strongly supports the Federal Communications Commission's goal, "... to ensure our wireless networks keep pace with the demand so they can support the critical economic, public safety, health care and other activities that increasingly rely on them. Meeting this challenge is essential to continuing U.S. leadership in technological innovation, growing our economy and maintaining our global competitiveness."

Goals in government are great; however, the rubber meets the road, when it becomes time to implement. You have made a good and fair policy decision with your plan to use "the idea of incentive auctions as a tool to help meet the nation's spectrum needs. Incentive auctions are a voluntary, market-based means of repurposing spectrum by encouraging licensees to voluntarily relinquish spectrum usage rights in exchange for a share of the proceeds from an auction of new licenses to use the repurposed spectrum."

Resist your urges to encumber the auctions with gimmicks. There is no need to stipulate auction set-asides for companies that are valued in the tens of billions of dollars. If the goal is to ensure that truly small or rural carriers gain access to low-band spectrum, the FCC should prohibit mega companies, such as T-Mobile, Sprint and DISH, from qualifying for the set-aside.

DISH's questionable conduct proves that a spectrum auction can produce bad results. DISH's abuse of the Designated Entity Program and auction policies in the recent AW-3 auction shows how rules that favor a few multi-billion dollar companies can harm the public. Move forward with the auction rules that you have. Stop adding gimmicks!

Sincerely,

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