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July 24, 2015

**EX PARTE VIA ECFS**

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

Re: ***Ex Parte Notification***  
*Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, AU Docket No. 14-252*

Dear Ms. Dortch:

On July 22, 2015, on behalf of T-Mobile USA, Inc. ("T-Mobile"),<sup>1</sup> I spoke separately with Ruth Milkman, Chief of Staff to Chairman Wheeler, and Howard Symons, Vice Chair of the Commission's Incentive Auction Task Force.

Consistent with T-Mobile submissions in the record of the proceedings referenced above, I explained how delayed implementation of the spectrum-reserve trigger could permit anti-competitive gaming by the dominant players.<sup>2</sup> I also noted the many alternative proposals in the record intended to accelerate the spectrum-reserve trigger as a means of preventing anti-competitive abuse.

I also highlighted numerous submissions urging the Commission to place relocated broadcast stations in the duplex gap when necessary to ensure that the Commission can reach higher spectrum-clearing targets.<sup>3</sup>

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<sup>1</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly traded company.

<sup>2</sup> See, e.g., Letter from Kathleen O'Brien Ham, Vice President, Federal Regulatory Affairs, T-Mobile USA, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, AU Docket No. 14-252, GN Docket No. 12-268 at 3-4 (July 21, 2015) ("*T-Mobile July 21 Letter*"); Letter of Trey Hanbury, Counsel to T-Mobile, USA, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, AU Docket No. 14-252, GN Docket No. 12-268, at 2 (July 10, 2015); Letter of Trey Hanbury, Counsel to T-Mobile, USA, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, AU Docket No. 14-252 (June 30, 2015)

<sup>3</sup> See *T-Mobile July 21 Letter* at 1-3.

Under section 1.1206(b)(2) of the Commission's rules, I have filed an electronic copy of this letter in the above-referenced dockets. Please direct any questions regarding this filing to me.

Respectfully submitted,

*/s/ Trey Hanbury*

Trey Hanbury  
Counsel to T-Mobile USA, Inc.

cc: Ruth Milkman  
Howard Symons