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February 17, 2016

EX PARTE VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 Auction 1001 and 1002, AU Docket No. 14-252*

Dear Ms. Dortch:

T-Mobile USA, Inc. (“T-Mobile”)¹ recently partnered with two respected broadcast engineering firms, Broadcast Tower Technologies, Inc. (“BTTi”) and Hammett & Edison, Inc. (“Hammett & Edison”), to study the post-auction broadcast relocation process. T-Mobile asked BTTi and Hammett & Edison to assist in a comprehensive evaluation of the time and resources required to transition numerous television broadcast operations from their current frequency to a new, more efficient band plan. The results of that analysis appear in the attached report, entitled “On Time and On Budget: Completing the 600 MHz Incentive Auction Repacking Process Within the FCC’s 39-Month Relocation Deadline and the Budget Established by Congress.”

T-Mobile, BTTi and Hammett & Edison studied the FCC’s repacking-simulation data, performed in-depth analysis of the information broadcast stations submitted to the FCC and conducted numerous phone interviews with broadcast industry vendors throughout the country. T-Mobile, BTTi and Hammett & Edison used this information to conduct station-by-station analysis of the resources required to move all remaining stations in the United States to a new band plan following the conclusion of the 600 MHz broadcast incentive auction. Based on this comprehensive, ground-up analysis, the report concludes the broadcast industry can transition to a more spectrum-efficient band plan within the 39-month timeframe established by the Commission and at or under the \$1.75 billion budget set by Congress.

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

T-Mobile, its representatives and some of the report's principal authors² met with Commission staff to review the results of the T-Mobile, BTTi and Hammett & Edison study on Friday, February 12, 2016.³ We discussed the attached presentation that summarizes some of the report's major findings. As detailed in the attached report and supporting presentation, T-Mobile, BTTi and Hammett & Edison conclude that the broadcast transition can occur on time and on budget.

Please contact me at (202) 654-5918 if you have any questions regarding this submission.

Respectfully submitted,

/s/ Steve Sharkey
Steve Sharkey
Vice President, Government Affairs
Technology and Engineering Policy

Attachments

cc (via email): Gary Epstein
Howard Symons
Hillary DeNigro
Melissa Dunford
Pamela Gallant
Mary Margaret Jackson
Sasha Javid
Charles Meisch
Aspasia Paroutsas
Bill Scher
Blaise Scinto
Jennifer Tomchin

² Steve Sharkey, Chris Wiczorek and Mark Bishop (by phone) represented T-Mobile. Jack Boone represented BTTi. Rajat Mathur represented Hammett & Edison (by phone). Tom Peters, Senior Technical Advisor at Hogan Lovells US LLP ("Hogan Lovells"), representing T-Mobile, and Trey Hanbury and Sean Spivey of Hogan Lovells, counsel for T-Mobile, also attended the meeting.

³ Gary Epstein, Howard Symons, Hillary DeNigro, Melissa Dunford (by phone), Pamela Gallant, Mary Margaret Jackson, Sasha Javid, Charles Meisch, Aspasia Paroutsas, Bill Scher, Blaise Scinto and Jennifer Tomchin (by phone) represented the FCC.