



Competitive Carriers Association
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March 9, 2016

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE
GN Docket No. 12-268: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*

Dear Ms. Dortch:

On March 7, 2016, Steven Berry, Courtney Neville, and I, with Competitive Carriers Association (CCA), and Professor Peter Cramton and his associate Darrell Hoy via telephone, met with Dorann Bunkin, Hillary DeNigro, Melissa Dunford, Gary Epstein, Pamela Gallant, Sasha Javid, Jean Kiddoo, Bill Lake, Charles Meisch, Aspasia Paroutsas, Blaise Scinto, Howard Symons, and Jennifer Tomchin (via conference bridge), to discuss the broadcaster relocation study commissioned by CCA and executed by auction expert Peter Cramton, Professor of Economics at the University of Maryland. Professor Cramton concludes that the Commission can comfortably repack broadcast television licensees, regardless of whether there are 700 or 1000+, within the current timeline and statutory budget.¹ Professor Cramton's analysis yields an estimate of between 756 and 888 stations as the total number of incumbents that must relocate based on his repacking simulation, the number of trained tower crews, the number of tall towers and broadband antennas that can be retuned, and

¹ Professor Cramton is one of the world's foremost experts in auction design. He co-invented the spectrum auction design used in Canada, Australia, and many European countries to auction 4G spectrum. Professor Cramton also co-designed the most comprehensive Broadcast Incentive Auction simulation submitted in the record to date. See Peter Cramton, Hector Lopez, David Malec and Pacharasut Sujarittanonta, *Design of the Reverse Auction in the Broadcast Incentive Auction*, attached to Ex Parte Letter from Preston Padden, Executive Director, Expanding Opportunities for Broadcasters Coalition to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, AU Docket No. 14-252 (filed June 15, 2015); see also See Ex Parte Letter from Rebecca Murphy Thompson, EVP & General Counsel, CCA to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Feb. 10, 2016) (Cramton Study).

basic supply and demand.² Any delay of the incentive auction could risk devaluing 600 MHz spectrum resources, or disincentive potential bidders from participating in the forward auction. Based on the study, CCA reiterates its support for the Commission's plan to conclude the broadcaster relocation within 39 months following the close of the incentive auction.³

In addition, CCA emphasized the importance of gaining access to spectrum purchased, while simultaneously ensuring a safe and expeditious repacking plan. CCA will continue to work with tower erectors and engineers to manage the complexities of the relocation process safely, effectively and efficiently, including possible collaboration with the tower industry on training programs and certification for tower crews prior to the start of the repacking process. CCA looks forward to working with the Commission to effectuate an expeditious and safe timeline for the post-auction transition.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
EVP & General Counsel
Competitive Carriers Association

cc (via email): Gary Epstein
Howard Symons
Dorann Bunkin
Hillary DeNigro
Melissa Dunford
Pamela Gallant
Sasha Javid
Jean Kiddoo

Bill Lake
Charles Meisch
Aspasia Paroutsas
Blaise Scinto
Jennifer Tomchin
Peter Cramton
Darrell Hoy

² Cramton Study at 1, 5-7.

³ *See Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Dec. 22, 2015); *see also Ex Parte* Letter from Steve Sharkey, Vice President, Government Affairs, T-Mobile USA, Inc. to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Feb. 18, 2016).