



April 22, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte Presentation, Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, and 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Radio Services, WT Docket No. 10-112

On April 20, 2016, Brian Josef, Assistant Vice President, Regulatory Affairs of CTIA®, along with Celia Nogales of AT&T, Rick Engelman of Sprint, Grant Spellmeyer of US Cellular and Peter Connolly of Holland and Knight (representing US Cellular), and Tamara Preiss of Verizon met with Roger Noel and Joyce Jones of the Wireless Telecommunications Bureau's Mobility Division, to discuss further enhancements to the Commission's license renewal rules in the above-referenced proceeding.

During the meeting, the parties discussed elements for a potential framework for establishing and applying uniform renewal standards consistently for Commission licensees' renewal applications. As part of that framework, the parties considered the creation of reasonable safe harbors that may be effectively utilized by applicants while preserving agency resources for those who meet the criteria. Further, the parties discussed the process and factors that would apply to renewal applicants who seek renewal outside of the safe harbor process. Finally, the parties addressed relevant transition periods and the need for adequate time for licensees to come into compliance with any rules that the Commission might adopt.

The parties discussed the goal of balancing the Commission's desire to ensure that licensees do not permanently discontinue service during their license terms with licensees' needs to maintain and upgrade their networks to the benefit of wireless consumers. CTIA and members highlighted the need to address questions regarding continuous service and circumstances that could trigger an inquiry into the occurrence of a permanent discontinuance and compliance in cases of license acquisitions and partitioning.

CTIA explained that it is encouraged by the direction of several of the new proposals suggested by Staff during the meeting. CTIA urged the Commission to seek public comment to allow parties an opportunity to clarify and strengthen the proposed rules where appropriate, so



all affected licensees may fully understand the requirements that will be placed on the renewal process. CTIA expressed its strong desire to work collaboratively to reach final conclusions that will allow certainty and simplicity in the renewal processes.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and emailed to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Brian M. Josef

Assistant Vice President, Regulatory Affairs

CTIA®

cc: Roger Noel
Joyce Jones