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April 5, 2006

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: United States Cellular Corporation
Ex Parte Presentation
AU Docket No. 06-30

Dear Ms. Dortch:

On behalf of United States Cellular Corporation, this is to provide additional information concerning proposed alternative procedures for restricting bidder identity information in Auction #66 which we believe will increase competition and efficiency in the auction and enhance opportunities for successful participation by smaller bidders.

In a previous ex parte filed March 17, 2006, a statement submitted for Professor Robert J. Weber, J.L. Kellogg Graduate School of Management, Northwestern University, described a compromise proposal which addresses what we view as the most problematic aspects of the uncertainty issues for smaller bidders resulting from the FCC's proposal to withhold bidder identity information. Under this compromise, the FCC would periodically release auction "snapshots," while suppressing bidder-identity information in intervening auction rounds.

Attached is supplemental information prepared by Professor Weber on possible randomized methodologies for determining the intervals between snap-shot rounds which is contained in a recent email to a Commission staff member.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed.

In the event there are questions regarding this matter, please contact the undersigned.

Sincerely,

George Y. Wheeler

Cc(via email):

Kevin.Martin@fcc.gov
Fred.Campbell@fcc.gov
Barry.Ohlson@fcc.gov
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-----Original Message-----
From: Bob Weber [mailto:rjweber@northwestern.edu]
Sent: Tuesday, April 04, 2006 11:01 AM
To: 'Evan Kwerel'
Subject: Randomized snapshots

Dear Evan,

Attached is a spreadsheet that compares three alternative randomized-snapshot methods: (a) 0.2 every round, (b) 0.5 after three or more quiet rounds, and (c) 0.2 after 2 quiet rounds, 0.25 after 3, and then 0.5 after four or more.

All yield, on average, four quiet rounds between snapshots. But they differ in the expected maximum quiet "gap" between snapshots in the course of 100 rounds. Indeed, the first has an expected maximum gap of about 16 rounds, while the latter two have expected maximum gaps of 8 or fewer rounds, not much more than the alightly-below-6 (over 100 rounds) in the equiprobable three-to-seven randomization proposal.

Obviously, other possibilities exist. But these at least leave the conditional probability of a snapshot in any round at 50% or less.

This is just math: Do we need to file an ex parte?

Best regards, Bob

Some Randomized-Snapshot Procedures

All three procedures generate, on average, 20 snapshots in 100 rounds (actually, a bit less because of the truncation after 100 rounds). However, the maximum number of consecutive quiet rounds, in the course of 100 rounds, varies substantially: It's about 16 rounds for the first procedure, and around 8 for the other two.

(Press 'F9' to rerun a single simulated observation.)

	snapshot with probability 0.2 in every round		**after three or more quiet rounds, snapshot with probability 0.5**			**after 2, 3, or more quiet rounds, snapshot with probability 0.2, 0.25, and 0,5, respectively**		
		21			**19**			**21**
round		**15**			**9**			**6**
1	1	gaps+1	1	0	gaps+1	1	0	gaps+1
2	2		2	0		2	0	
3	2	**0**	3	0	**0**	3	0	**0**
4	2	**0**	4	0	**0**	4	0	**0**
5	2	**0**	5	0	**0**	5	5	**5**
6	2	**0**	6	6	**6**	1	5	**0**
7	2	**0**	1	6	**0**	2	5	**0**
8	2	**0**	2	6	**0**	3	5	**0**
9	2	**0**	3	6	**0**	4	5	**0**
10	2	**0**	4	6	**0**	5	10	**5**
11	2	**0**	5	11	**5**	1	10	**0**
12	2	**0**	1	11	**0**	2	10	**0**
13	13	**11**	2	11	**0**	3	13	**3**
14	13	**0**	3	11	**0**	1	13	**0**
15	15	**2**	4	11	**0**	2	13	**0**
16	16	**1**	5	16	**5**	3	13	**0**
17	16	**0**	1	16	**0**	4	13	**0**
18	18	**2**	2	16	**0**	5	18	**5**
19	18	**0**	3	16	**0**	1	18	**0**
20	18	**0**	4	16	**0**	2	18	**0**
21	18	**0**	5	21	**5**	3	18	**0**
22	18	**0**	1	21	**0**	4	18	**0**
23	23	**5**	2	21	**0**	5	18	**0**
24	23	**0**	3	21	**0**	5	24	**6**
25	23	**0**	4	25	**4**	1	24	**0**
26	23	**0**	1	25	**0**	2	24	**0**
27	23	**0**	2	25	**0**	3	24	**0**
28	23	**0**	3	25	**0**	4	24	**0**
29	23	**0**	4	29	**4**	5	29	**5**
30	23	**0**	1	29	**0**	1	29	**0**
31	23	**0**	2	29	**0**	2	29	**0**
32	23	**0**	3	29	**0**	3	29	**0**
33	23	**0**	4	29	**0**	4	33	**4**
34	34	**11**	5	34	**5**	1	33	**0**

35	34	**0**	1	34	**0**	2	33	**0**
36	34	**0**	2	34	**0**	3	33	**0**
37	34	**0**	3	34	**0**	4	33	**0**
38	34	**0**	4	38	**4**	5	38	**5**
39	39	**5**	1	38	**0**	1	38	**0**
40	39	**0**	2	38	**0**	2	38	**0**
41	39	**0**	3	38	**0**	3	38	**0**
42	39	**0**	4	38	**0**	4	38	**0**
43	43	**4**	5	38	**0**	5	43	**5**
44	44	**1**	6	44	**6**	1	43	**0**
45	44	**0**	1	44	**0**	2	43	**0**
46	44	**0**	2	44	**0**	3	43	**0**
47	44	**0**	3	44	**0**	4	47	**4**
48	44	**0**	4	44	**0**	1	47	**0**
49	49	**5**	5	44	**0**	2	47	**0**
50	49	**0**	6	50	**6**	3	47	**0**
51	51	**2**	1	50	**0**	4	47	**0**
52	52	**1**	2	50	**0**	5	47	**0**
53	52	**0**	3	50	**0**	5	53	**6**
54	52	**0**	4	50	**0**	1	53	**0**
55	52	**0**	5	50	**0**	2	53	**0**
56	56	**4**	6	50	**0**	3	53	**0**
57	56	**0**	7	50	**0**	4	53	**0**
58	56	**0**	8	50	**0**	5	53	**0**
59	56	**0**	9	50	**0**	5	53	**0**
60	60	**4**	10	60	**10**	5	60	**7**
61	61	**1**	1	60	**0**	1	60	**0**
62	61	**0**	2	60	**0**	2	60	**0**
63	61	**0**	3	60	**0**	3	60	**0**
64	64	**3**	4	60	**0**	4	60	**0**
65	65	**1**	5	60	**0**	5	65	**5**
66	65	**0**	6	66	**6**	1	65	**0**
67	67	**2**	1	66	**0**	2	65	**0**
68	67	**0**	2	66	**0**	3	68	**3**
69	67	**0**	3	66	**0**	1	68	**0**
70	67	**0**	4	70	**4**	2	68	**0**
71	67	**0**	1	70	**0**	3	68	**0**
72	72	**5**	2	70	**0**	4	68	**0**
73	72	**0**	3	70	**0**	5	73	**5**
74	74	**2**	4	74	**4**	1	73	**0**
75	75	**1**	1	74	**0**	2	73	**0**
76	75	**0**	2	74	**0**	3	73	**0**
77	75	**0**	3	74	**0**	4	73	**0**
78	75	**0**	4	78	**4**	5	78	**5**
79	75	**0**	1	78	**0**	1	78	**0**
80	75	**0**	2	78	**0**	2	78	**0**
81	75	**0**	3	78	**0**	3	78	**0**
82	75	**0**	4	78	**0**	4	78	**0**
83	75	**0**	5	78	**0**	5	83	**5**
84	75	**0**	6	78	**0**	1	83	**0**
85	75	**0**	7	78	**0**	2	83	**0**
86	75	**0**	8	86	**8**	3	83	**0**

87	87	**12**	1	86	**0**	4	87	**4**
88	87	**0**	2	86	**0**	1	87	**0**
89	87	**0**	3	86	**0**	2	87	**0**
90	87	**0**	4	86	**0**	3	87	**0**
91	87	**0**	5	91	**5**	4	87	**0**
92	87	**0**	1	91	**0**	5	92	**5**
93	87	**0**	2	91	**0**	1	92	**0**
94	87	**0**	3	91	**0**	2	92	**0**
95	87	**0**	4	95	**4**	3	95	**3**
96	87	**0**	1	95	**0**	1	95	**0**
97	97	**10**	2	95	**0**	2	95	**0**
98	97	**0**	3	95	**0**	3	95	**0**
99	97	**0**	4	99	**4**	4	95	**0**
100	97	**0**	1	99	**0**	5	95	**0**
101	97	**0**	2	99	**0**	5	95	**0**
102	97	**0**	3	99	**0**	5	102	**7**
103	97	**0**	4	103	**4**	1	102	**0**
104	97	**0**	1	103	**0**	2	102	**0**
105	97	**0**	2	103	**0**	3	105	**3**
106	97	**0**	3	103	**0**	1	105	**0**
107	97	**0**	4	107	**4**	2	105	**0**
108	97	**0**	1	107	**0**	3	105	**0**
109	97	**0**	2	107	**0**	4	105	**0**
110	97	**0**	3	107	**0**	5	110	**5**
111	97	**0**	4	111	**4**	1	110	**0**
112	97	**0**	1	111	**0**	2	110	**0**
113	113	**16**	2	111	**0**	3	110	**0**
114	113	**0**	3	111	**0**	4	110	**0**
115	113	**0**	4	111	**0**	5	110	**0**
116	113	**0**	5	111	**0**	5	110	**0**
117	117	**4**	6	111	**0**	5	117	**7**
118	117	**0**	7	111	**0**	1	117	**0**
119	117	**0**	8	119	**8**	2	117	**0**
120	117	**0**	1	119	**0**	3	120	**3**

Simulation results

E17	E18	I17	I18	M17	M18	**monitored cell**
19.81901	**15.98849**	**19.80466**	**7.7418**	**19.79877**	**7.99402**	**mean**
3.982016	5.289673	1.315371	1.808128	1.537205	1.803828	**sample standard deviation**
4	5	13	4	11	4	**minimum**
39	71	24	24	27	24	**maximum**
100,000	100,000	100,000	100,000	100,000	100,000	**number of simulation runs**

number of snapshots in 100 rounds (rounds 21-120)
maximum number of consecutive quiet rounds