

March 23, 2007

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VIA ELECTRONIC FILING

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWA325
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation in WT Docket No. 06-150

Dear Ms. Dortch:

On March 23, 2007, SpectrumCo LLC (“SpectrumCo”) representatives David Don, economic consultant Dr. Coleman Bazelon, and I met with FCC Commissioner Jonathan Adelstein and his legal advisor Barry Ohlson, and met separately with Commissioner Michael Copps and his advisor John Branscome, to discuss the above-captioned 700 MHz proceeding.

During the meeting, SpectrumCo’s representatives discussed the *ex parte* letter and the two economic analyses previously filed in this docket on January 8 and March 6, 2007. Specifically, SpectrumCo discussed the benefits of its proposed 700 MHz band plan, featuring a mix of geographic area licenses similar to the “building block” model used in the FCC’s successful Advanced Wireless Service auction. In addition, SpectrumCo noted three principles for choosing 700 MHz block sizes and license areas, as reflected in the attached summary and Dr. Bazelon’s March 6 economic analysis.

Please contact me if there are any questions regarding this filing.

Sincerely,

/s/ Michele C. Farquhar

Michele C. Farquhar
Attorney for SpectrumCo LLC

cc: Commissioner Jonathan Adelstein
Commissioner Michael Copps
Barry Ohlson
John Branscome

Three Principles for Choosing 700 MHz Block License Sizes

Principle #1: EA licenses are best suited to meet the demand for medium and large geographic area coverage, with added efficiencies for each additional block licensed on an EA basis.

- EA building blocks provide bidders with the flexibility to create a package of licenses that best meets their individual needs.
- The flexibility and efficiency gains are increased with each additional EA license.
- Offering multiple EA licenses minimizes potential aggregation risk.
- Smaller license areas reduce the need for strict performance requirements.
- Three 10 MHz EA licenses in the Upper 700 MHz band and one 12 MHz EA license in the Lower band would be ideal.

Principle #2: Only one CMA license is needed to meet the demand for spectrum with small geographic coverage.

- CMA demand is limited – most comes from rural areas that support fewer operators than urban markets.
- In the AWS Auction, only 20 of the 734 CMA licenses had more than two CMA-only bidders, and over half of the RSAs did not attract a single bid from a CMA-only bidder. Over half of the CMA licenses (398) attracted only two or fewer bidders.
- If multiple CMAs are used, aggregation risk will increase.

Principle #3: Smaller bandwidths (10 MHz blocks in the Upper 700 MHz band) will maximize flexibility.

- The current band plan severely limits the likelihood of assigning the band efficiently during the auction.
- Dividing the one 20 MHz license into two 10 MHz licenses would allow more bidders to win licenses.
- Three 10 MHz licenses in the Upper 700 MHz band will reduce aggregation risk, especially if the three licenses are all EAs.