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July 17, 2007

57739-000020

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

Re: Service Rules for the 690-746, 747-762, and 777-792 MHz Bands (WT Docket Nos. 06-150, 06-169, 96-86 and PS Docket No. 06-229); Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers (WT Docket No. 05-265)

Dear Ms. Dortch:

On July 16, 2007, Carl W. Northrop of Paul, Hastings, Janofsky & Walker LLP, on behalf of MetroPCS Communications, Inc. ("MetroPCS"), participated in a telephone conference call with Angela Giancarlo, legal advisor to Commissioner McDowell. This oral presentation was consistent with the pleadings and *ex partes* filed on behalf of MetroPCS in the above-referenced proceedings.

In addition, MetroPCS expressed concern that the use of combinatorial bidding, even limited combinatorial bidding which only allowed a nationwide 22 MHz bid to be placed on a package basis, would create a *de facto* nationwide license that would deprive small and mid-tier bidders of any prospect of success in the Upper Band. MetroPCS noted that it would be better to have an initial separate auction for a nationwide 22 MHz channel to see whether a reserve price (e.g. \$4.6 billion) could be met, followed by a standard SMR auction conducted for the same spectrum on an EA/CMA basis, with the winner(s) being determined by the highest aggregate price for all licenses. This approach would create a meaningful opportunity for a single bidder to secure a nationwide 22 MHz license while offering some prospect for smaller bidders to trump the nationwide bid without the unfair strictures of combinatorial bidding.

Lastly, MetroPCS stated, with regards to the Commission's roaming proceeding, that even if the Commission adopted an automatic roaming rule, it should retain the manual roaming rule because the rule was based on the legal principle that manual roaming is a common carrier service, and that principle has not changed.

This letter is being filed pursuant to Section 1.1206 of the Commission's rules. 47 C.F.R. § 1.1206.

Paul Hastings

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Kindly refer any questions in connection with this letter to the undersigned.

Respectfully submitted,

/s/ Michael Lazarus

Michael Lazarus
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Angela Giancarlo

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