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May 5, 2008

57739-000020

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

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands (WT Docket No. 06-150, 06-169, 96-86 and PS Docket No. 06-229; AU Docket No. 07-157)

Dear Ms. Dortch:

On May 2, 2008, Carl Northrop of Paul, Hastings, Janofsky & Walker LLP, representing MetroPCS Communications, Inc., participated in a conference with Angela Giancarlo, Chief of Staff for Commissioner Robert McDowell.

During this conference, MetroPCS made reference to its earlier-expressed concerns regarding the viability of a public-private partnership to deliver mission critical public safety services utilizing 700 MHz D-Block spectrum, consistent with the pleadings and *ex partes* filed on behalf of MetroPCS in the above-referenced proceedings. MetroPCS noted that if the Commission proceeds with a D Block reauction that retains elements of a public-private partnership, it should adopt safeguards to ensure that any bidder for the spectrum is legitimate and financially qualified to construct an adequate system within the necessary timeframes. MetroPCS also noted that if no such qualified bidder emerges in the course of such a reauction, the Commission should then hold a prompt reauction of the spectrum and allow it to be devoted to commercial use – where there remains substantial unsatisfied demand – without any public-private partnership restrictions.

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) Commissioner McDowell  
Angela Giancarlo