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January 14, 2010

57739-000020

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

Re: *Fostering Innovation and Investment in the Wireless Communications Market; A National Broadband Plan for our Future*, GN Docket Nos. 09-157 and 09-51; *Comment Sought On Spectrum for Broadband; NBP Public Notice # 6*, GN Docket Nos. 09-47, 09-51 and 09-137; *AWS-2*, WT Docket No. 04-356; *AWS-3*, WT Docket No. 07-195

Dear Ms. Dortch:

On January 13, 2010, Mark A. Stachiw of MetroPCS Communications, Inc. (“MetroPCS”), along with Carl W. Northrop of Paul, Hastings, Janofsky & Walker LLP (“Paul Hastings”) and Justin Lilley of TeleMedia Policy Corp., met with Blair Levin and discussed issues under consideration in the above-referenced proceedings. The oral presentation in these meetings was consistent with the pleadings and *ex partes* filed on behalf of MetroPCS in the above-referenced proceedings, as further supplemented below.

MetroPCS strongly supported the Commission’s recognition that additional broadband spectrum is needed in both the near term and the long term for commercial mobile wireless services. MetroPCS indicated that there is a particularly acute need for paired spectrum below 3.5 GHz to meet demand. To address this need, MetroPCS recommended that the Commission finalize the service rules for and auction the two paired 10 MHz H and J Block channels in the AWS-2 Block as soon as possible. MetroPCS also encouraged the Commission to actively explore pairing 20 MHz of spectrum in the 1755-1780 MHz band with the 2155-2175 MHz AWS-3 Block, that it be channeled into four 10 MHz paired channels (5 MHz by 5 MHz) channels and auctioned as soon as possible.

MetroPCS also advocated reviewing the Mobile Satellite Service (“MSS”) allocations with an eye toward making some or all of such spectrum available by auction for commercial terrestrial mobile services.

MetroPCS strongly supported a comprehensive spectrum inventory conducted in cooperation with NTIA with an eye toward identifying spectrum that can be rolled out for commercial use at predictable time intervals so that auctions are not unduly skewed by scarcity concerns.

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MetroPCS stated that it was critical for the licensing rules in all forthcoming auctions to be designed to encourage the broader dissemination of licenses than occurred in the 700 MHz band auction in which nearly \$16 billion of the \$19.6 billion worth of licenses were acquired by the two largest wireless companies. MetroPCS also indicated that spectrum caps alone would not ensure that licensed spectrum was fairly distributed among potential bidders, because there are competitive benefits in getting an increased number of carriers to a minimum spectrum threshold.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Carl W. Northrop', written in a cursive style.

Carl W. Northrop  
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Blair Levin