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February 15, 2013

**VIA ECFS**

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

**Re: Notice of Ex Parte Presentation, *Policies Regarding Mobile Spectrum Holdings*, WT Docket No. 12-269**

Dear Ms. Dortch:

On February 13, 2013, Steven Berry, Rebecca Murphy Thompson, Tim Donovan, and Sean Spivey of Competitive Carriers Association (“CCA”), together with the undersigned, met with Joel Taubenblatt, Brenda Boykin, Michael Janson, Thuy Tran, Weiren Wang, and John Billings of the Wireless Telecommunications Bureau to discuss the above-referenced proceeding. We discussed the attached slide deck, focusing in particular on how the recent spate of completed and proposed spectrum acquisitions by AT&T and Verizon Wireless has exacerbated existing concerns about undue concentration in the wireless marketplace. We discussed several metrics that underscore the dominance of the largest carriers and explained that the obstacles confronting smaller providers are steadily more challenging.

As a result of this diminution in competition in recent years and accelerating market concentration, CCA has proposed that the Commission establish three screens for secondary market transactions and future spectrum auctions: one for local spectrum holdings below 1 GHz, one for aggregate local spectrum holdings, and a third for nationwide holdings. We described this proposal and other recommendations included in CCA’s comments. We also urged the Commission to complete its revision of the spectrum screen by the end of the year and to utilize the revised framework in connection with the upcoming H Block and television broadcast spectrum auctions.

LATHAM & WATKINS<sup>LLP</sup>

Please contact the undersigned with any questions regarding these issues.

Sincerely,

*/s/ Matthew A. Brill*

Matthew A. Brill

cc: Joel Taubenblatt  
Brenda Boykin  
Michael Janson  
Thuy Tran  
Weiren Wang  
John Billings