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EX PARTE SUBMISSION

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

Re: Auction of H Block Licenses in the 1915-1920 MHz and 1995-2000 MHz Bands, AU
Docket No. 13-178

Dear Ms. Dortch:

DISH Network Corporation (“DISH”) files this letter in support of the Commission’s proposal to set a reserve price for licenses in the upcoming H Block auction.¹ Based on recent auctions and sales in the secondary market, DISH estimates that the value of the H Block is at least \$0.50 per megahertz of bandwidth per population (“MHz-POP”) on a nationwide aggregate basis. The Commission’s 2006 auction of similar AWS-1 spectrum, for example, resulted in bidders paying on average \$0.54 per MHz-POP.² More recently, Verizon’s purchases of AWS spectrum from Cox and SpectrumCo appear to have valued that spectrum at \$0.61 per MHz-POP and \$0.69 per MHz-POP, respectively.³ As a result, financial institutions have estimated the value of the H Block spectrum to be, on average, between \$0.62⁴ and \$1.00⁵ per MHz-POP.

¹ See Public Notice, “Auction of H Block Licenses in the 1915-1920 MHz and 1995-2000 MHz Bands,” AU Docket No. 13-178, DA 13-1540 ¶ 53 (2013) (“H Block Auction Procedures Public Notice”).

² See Letter from Trey Hanbury, counsel to T-Mobile USA, Inc., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 12-269, at Attachment 2: J.P. Morgan Analyst Report, Telecom Services & Towers: Spectrum Overview & Valuation Matrix - Carrier by Carrier Spectrum Value Across the Wireless Industry, p. 15 (Aug. 15, 2013).

³ *Id.*

⁴ *Id.* at 9.

⁵ See Letter from Tamara Preiss, Verizon Wireless, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 12-269, at Attachment: Brett Feldman et al., Deutsche Bank Markets Research, Sprint Nextel Corp., The New Spectrum Powerhouse; Reinstating Coverage at Buy, p. 15 (July 17, 2013).

In addition, DISH supports the Commission's plan to use hierarchical package bidding in auctioning the H Block, and in particular supports the offering of a package comprising all markets in the contiguous 48 states.⁶

Respectfully submitted,

/s/ Jeffrey H. Blum

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⁶ See H Block Auction Procedures Public Notice ¶ 17.