



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
MCLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

December 6, 2013

Ari Meltzer
202.719.7467
ameltzer@wileyrein.com

BY ECFS

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

Re: In the Matter of Expanding the Economic and Innovation Opportunities of
Spectrum Through Incentive Auctions, GN Docket No. 12-268
NOTICE OF ORAL EX PARTE PRESENTATION

Dear Ms. Dortch:

On Wednesday, December 4, 2013, Preston Padden, Executive Director of the Expanding Opportunities for Broadcasters Coalition (the "Coalition"), along with Jeffrey A. Eisenach of Navigant Economics and Peter Cramton, Professor of Economics at University of Maryland, on behalf of the Coalition, met with Gary Epstein, Chairman of the Incentive Auction Task Force; William Lake, Chief of the Media Bureau; Evan Kwerel of the Office of Special Projects and Wireless Telecommunications Bureau; Brett Tarnutzer, Sasha Javid, and Jonathan McCormack of the Wireless Telecommunications Bureau; and Ilya Segal of Auctionomics.

During the meeting, Professor Cramton made a presentation, entitled *Scoring in the Reverse Auction*, in which he argued that "scoring" of television stations is neither practical nor even possible in the forthcoming incentive auction. Professor Cramton explained that, to be effective, scoring requires: (1) that the FCC have full knowledge of every station's reservation values (which is not possible); and (2) that the FCC adjust scoring weights dynamically between each round of the auction (which would add unrealistic complexity and delay to the auction). On balance, he argued that no scoring is the best option for the FCC and that scoring without knowledge of reservation prices and without dynamic reweighing would appear opaque and arbitrary. Professor Cramton provided several examples to support this case.

Pursuant to Section 1.1206 of the Commission's rules, attached hereto is a copy of Professor Cramton's presentation.



Ms. Marlene Dortch
December 6, 2013
Page 2

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Ari Meltzer".

Ari Meltzer
Counsel to the Expanding Opportunities for Broadcasters Coalition

cc (via e-mail):

Gary Epstein
Sasha Javid
Evan Kwerel
William Lake
Jonathan McCormack
Ilya Segal
Brett Tarnutzer