



Competitive Carriers Association
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December 23, 2013

Via ECFS

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

RE: EX PARTE PRESENTATION

GN Docket No. 12-268: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*

Dear Ms. Dortch,

Competitive Carriers Association (“CCA”) recently filed a hybrid geographic licensing design for use in the upcoming incentive auction, as a proposed alternative should the Commission decide it cannot utilize Cellular Market Areas (“CMAs”) for the auction.¹ CCA’s proposal is based on both CMA and Economic Area (“EAs”) boundaries, and would divide EAs into Partial Economic Areas (“PEAs”).² PEAs would enable smaller and rural carriers to bid on portions of EAs to obtain more efficiently sized spectrum licenses.³ The Commission has since issued a Public Notice seeking comment on CCA’s proposal.⁴

CCA’s proposal included a first draft of a map and county data representing potential PEA boundaries, but CCA reserved the right to make modifications to these drafts based upon continued feedback from its members.⁵ Attached is a revised PEA map and county data for consideration by the Commission and other interested parties. CCA asks that parties who comment on particular PEA boundaries reference this updated map and data.⁶ Finally, this revised map and county list is submitted

¹ *Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Nov. 27, 2013) (CCA PEAs Ex Parte).

² *Id.* at 2.

³ *Id.*

⁴ See Public Notice, *Wireless Telecommunications Bureau Seeks Comment on a Proposal to License the 600 MHz Band Using “Partial Economic Areas”*, GN Docket Nos. 12-268 & 13-185, DA 13-2351 (rel. Dec. 11, 2013) (PEAs Public Notice).

⁵ CCA PEAs Ex Parte at 2; see also PEAs Public Notice at 2, n.10.

⁶ CCA continues to reserve the right to submit additional revisions to the PEA map and county data both during and after the PEAs Public Notice comment period, based on information placed into the record, additional member feedback and other considerations.

without prejudice to CCA's continued support for the use of CMAs both in the incentive auction and in other upcoming auctions, such as AWS-3.⁷

Pursuant to Section 1.1206 of the Commission's Rules, this *ex parte* presentation is being filed electronically with the Office of the Secretary.

Sincerely,

/s/ C. Sean Spivey

C. Sean Spivey
Assistant General Counsel

cc (via email): Mr. Gary Epstein
Mr. Chris Helzer
Mr. John Leibovitz
Mr. Paul Malmud
Ms. Blaise Scinto
Mr. Edward "Smitty" Smith
Ms. Jessica Almond
Ms. Martha Stancill
Mr. Brett Tarnutzer
Ms. Jennifer Tomchin
Ms. Margaret Wiener
Ms. Madelaine Maior

Attachment (1)

⁷ CCA PEAs Ex Parte at 2; PEAs Public Notice at 2, n.9.