



December 23, 2013

VIA ELECTRONIC FILLING

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

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

Dear Ms. Dortch:

On December 20, 2013 Caressa D. Bennet, General Counsel of the Rural Wireless Association (“RWA”)¹ and Jill Canfield, General Counsel for NTCA - The Rural Broadband Association (“NTCA”)² met with John Leibovitz, Blaise Scinto, Jennifer Tomchin, Madelaine Maior, and Paul Malmud of the Federal Communications Commission’s (“FCC” or “Commission”) Wireless Telecommunications Bureau and Edward Smith (by phone) of the Incentive Auctions Task Force.

During this meeting, the parties discussed RWA’s and NTCA’s joint proposal to revise the geographic licensing model for the Incentive Auction from a strictly Economic Area (“EA”) based model to an auction model that would allow the FCC to conduct the reverse broadcast auction, broadcast spectrum repacking, and forward spectrum auction on an EA basis but license

¹ The Rural Wireless Association, Inc. is a 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies who serve rural consumers and those consumers traveling to rural America. RWA’s members are small businesses serving or seeking to serve secondary, tertiary, and rural markets. RWA’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies. Each of RWA’s member companies serves fewer than 100,000 subscribers.

² NTCA represents nearly 900 rural rate-of-return regulated telecommunications providers. All of NTCA’s members are full service local exchange carriers and broadband providers, and many provide wireless, video, satellite, and/or long distance services as well.

December 23, 2013

Page 2 of 2

the spectrum on the basis of Metropolitan Statistical Areas (“MSAs”) and Rural Service Areas (“RSAs”), collectively Cellular Market Areas (“CMAs”).

The parties also discussed the fact that the proposal submitted by the Competitive Carrier Association, which proposes to create Partial Economic Areas (“PEAs”) results in geographic license areas west of the Mississippi that are too large and will make it difficult if not impossible for many RWA and NTCA carrier members to participate in the incentive auction. The parties discussed whether the PEAs might be made smaller in these Western areas to better accommodate the needs of small businesses and rural carriers. The parties also discussed the feasibility of conducting a two-phase auction, as opposed to a single auction and whether it would be practical for the FCC to hold an auction containing more than 350 auction lots.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

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