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EX PARTE VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Policies Regarding Mobile Spectrum Holdings*, WT Docket No. 12-269
Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions, Docket No. 12-268

Dear Ms. Dortch:

On Wednesday, January 15, 2014, Steve Sharkey, Chris Wieczorek, and Karri Kuoppamaki from T-Mobile USA, Inc. ("T-Mobile"),[1] and Trey Hanbury of Hogan Lovells US LLP, counsel to T-Mobile, met with Gary Epstein and Edward Smith of the Incentive Auction Task Force; Evan Kwerel and John Williams of the Office of Strategic Planning and Policy Analysis; Roger Sherman, John Leibovitz, Brett Tarnutzer, Blaise Scinto, Madelaine Maior, Paul Malmud, and Chris Helzer of the Wireless Telecommunications Bureau; and Julius Knapp of the Office of Engineering and Technology.

The meeting participants discussed a variety of topics relating to the incentive auction, including possible configurations for the 600 MHz band plan and ways to optimize the performance of a frequency division duplex ("FDD") band plan in situations where the incentive auction clears 120 MHz or more of broadcast spectrum. The parties discussed the value of supplemental downlink ("SDL") for enhancing downlink capacity given the highly asymmetrical nature of current LTE network traffic, and they compared the benefits of SDL to the benefits of designating additional paired broadband channels. The participants noted that maximizing FDD channels where more than 84 MHz is cleared likely requires two pairing configurations and, depending on the nature of the pairing configuration, performance constraints could make the second pairing potentially inferior to the primary pairing. The participants explained that the potential constraints, if any, would need to be weighed against gains for spectrum efficiency and competitive opportunities given the additional paired broadband spectrum that would be possible

[1] T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

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under a two-pairing configuration of FDD spectrum in the 600 MHz band. Next, the participants addressed the issue of the minimum scale sufficient to consider a band plan national in scope and, more specifically, the point at which population coverage of any given band plan might be considered nationwide or nearly nationwide. While a measurement of minimum national scale was identified as a significant consideration for determining when the Commission would lower its clearing targets during the auction, no specific threshold of population for nationwide or nearly nationwide coverage was proposed.

The representatives from T-Mobile then stressed the need for a clear and enforceable interoperability rule as well as the need to create durable incentives to maintain a post-auction interoperable regime. The parties also discussed the potential for interference from unlicensed operations in guard bands in light of the statutory directive that guard bands shall not be "larger than is technically reasonable to prevent harmful interference between licensed services outside the guard bands."[2] Finally, the parties closed the meeting by discussing the scope of constraints in border areas and the applicable operating assumptions in developing the constraint files.

Consistent with section 1.1206(b)(2) of the Commission's rules, please associate this letter with the above-referenced dockets.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to T-Mobile USA, Inc.

[2] *See* 47 U.S.C. § 1454(b).