March 18, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice, WT Docket 02-55

Dear Ms. Dortch:

On March 13, 2014, Lawrence Krevor, Vice President – Spectrum, James Goldstein, Gardner Foster for Sprint Corporation ("Sprint") and Chris Putala of Putala Strategies, LLC met separately with Louis Peraertz, Legal Advisor to Commissioner Clyburn, David Goldman, Legal Advisor to Commissioner Rosenworcel, Brendan Carr, Legal Advisor to Commissioner Pai, and Erin McGrath, Legal Advisor to Commissioner O'Reilly to discuss the above-captioned proceeding.

Sprint described the significant progress it and other 800 MHz stakeholders have made in completing 800 MHz Band Reconfiguration, the billions of dollars Sprint has spent to fund rebanding, and how each of the Commission's public policy goals in this proceeding have been exceeded. As a result of 800 MHz band reconfiguration progress to date, harmful interference to public safety communications from commercial 800 MHz networks has been virtually eliminated in much of the nation, additional 800 MHz spectrum has become available for public safety system improvements and expansion and over 2000 800 MHz licensees have reconfigured their systems without incident. In addition, reconfiguration of the 800 MHz band has facilitated Sprint repurposing its 800 MHz spectrum to deploy wireless broadband technologies to benefit its customers who demand increased voice and data capabilities, capacity and speed.

Sprint also expressed its support for the Commission eliminating the $850 million "floor" of the 800 MHz Letter of Credit, while still providing financial security for funding remaining 800 MHz retunes.[1] Sprint explained that the original Letter of Credit was set at $2.5 billion in 2004 and that based on Sprint's expenditures over the past nine years the Public Safety and Homeland Security Bureau ("Bureau") has authorized $1.650 billion in reductions in the Letter of Credit which now stands at $850 million and can be further reduced. Sprint noted that all stakeholders concur that the $850 million floor is no longer needed to guarantee Sprint's funding of the remaining 800 MHz reconfiguration costs.

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[1] *See* Petition for Declaratory Ruling filed by Sprint Nextel Corporation, WT Docket 02-55 (filed Jan. 22, 2013) ("Sprint Petition").

At each meeting, Sprint also expressed support for a streamlined and simplified process to "close-out" existing contracts with 800 MHz licensees once they have completed retuning. Sprint explained that the current contract reconciliation and audit-related requirements required by the Commission's 800 MHz Transition Administrator are burdensome to 800 MHz licensees, impose unnecessary costs on Sprint and are unwarranted given Sprint's extensive documentation of its 800 MHz financial support along with incumbent certifications of retuning completion.[2]

Pursuant to Section 1.106 of the Commission's Rules, Sprint hereby files this *ex parte* letter into the docket of the above-referenced proceeding.

Sincerely,

/s/ James B. Goldstein

James B. Goldstein
Senior Counsel – Government Affairs
Sprint Corporation

cc Louis Peraertz, Legal Advisor to Commissioner Clyburn
David Goldman, Legal Advisor to Commissioner Rosenworcel
Brendan Carr, Legal Advisor to Commissioner Pai
Erin McGrath, Legal Advisor to Commissioner O'Reilly

[2] Reply Comments of Sprint Nextel Corporation, WT Docket 02-55 (filed March 11, 2013).