



601 Pennsylvania Ave., NW  
Suite 800  
Washington, DC 20004  
202-654-5900

March 19, 2014

**SUBMITTED ELECTRONICALLY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Notice of Ex Parte Presentation**

**GN Docket No. 13-185, *Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands***

Dear Ms. Dortch:

On March 14, 2014, I had a telephone conversation with David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel regarding the above-referenced proceeding.

I noted the benefits of licensing the AWS-3 spectrum in smaller spectrum blocks and smaller geographic areas. T-Mobile US, Inc. ("T-Mobile") has advocated licensing AWS-3 spectrum in 5x5 megahertz blocks using a mix of cellular market areas ("CMAs") and Economic Areas ("EAs"). CMAs best complement the current AWS-1 license holdings of T-Mobile and other carriers. However, the Commission should prioritize maximizing the number of 5x5 megahertz licenses, and if the Commission feels that use of license sizes other than CMAs, including Partial Economic Areas,<sup>1/</sup> or EAs would facilitate making additional 5x5 megahertz blocks available, that is an acceptable trade-off. Licensing spectrum in 5x5 megahertz blocks remains the best way to provide the greatest opportunity for a wide variety of bidders to participate and obtain licenses that match their requirements.

I also stated that T-Mobile does not object to secondary use of the AWS-3 spectrum by government users provided that it is on a secondary non-interference basis, coordinated with primary non-government licensees, and does not interfere with primary non-government use.

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<sup>1/</sup> See Letter from Competitive Carriers Association, NTCA-The Rural Broadband Association, Rural Wireless Association, Inc., and Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, to Ms. Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 and GN Docket No. 13-185, at 2 (filed March 11, 2014).

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. A copy of this letter is also being provided to Mr. Goldman. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Chief Engineering and Technology Policy, Federal  
Regulatory Affairs

cc: David Goldman (electronically)