



March 20, 2014

**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*

**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,

The Competitive Carriers Association ("CCA"), NTCA – The Rural Broadband Association ("NTCA") and the Rural Wireless Association, Inc. ("RWA"), as well as the law firm Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP ("Blooston Rural Carriers")<sup>1</sup> recently filed a joint *ex parte* presentation outlining a compromise geographic license area proposal for use in the 600 MHz auction which divides the United States and its territories into 416 Partial Economic Areas ("PEAs").<sup>2</sup> This proposal was based on previous proposals submitted by CCA and RWA/NTCA on this issue, and referenced 1990 U.S. Census county data.

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<sup>1</sup> The Blooston Rural Carriers have previously been identified in the record of these proceedings. *See, e.g.*, Comments of the Blooston Rural Carriers, GN Docket Nos. 12-268, 13-185 at 12 (filed Jan. 9, 2014).

<sup>2</sup> *See Ex Parte* Letter from C. Sean Spivey, Assistant General Counsel, Competitive Carriers Association; Jill Canfield, Director, Legal and Industry & Assistant General Counsel, NTCA – The Rural Broadband Association; Caressa D. Bennet, General Counsel, Rural Wireless

To accommodate the use of 2010 U.S. Census county data to configure PEA boundaries, and to correct minor inadvertent errors in their first submission, CCA, NTCA, RWA and the Blooston Rural Carriers submit the attached revised PEA map and associated county list (based on 2010 U.S. Census county data). Importantly, these revisions do not increase the number of PEA territories (which remain at 416). Specifically, the following material revisions are the only ones effected by this filing:

- Boone County, Illinois is moved from PEA 79 (IL 12) to PEA 339 (IL 7);
- Madison County, Illinois is moved from PEA 405 (IL 13) to PEA 403 (MO 6);
- DeSoto County, Mississippi is moved from PEA 359 (TN 9) to PEA 360 (MS 1);
- The geographic territory now constituting Broomfield County, Colorado is included in PEA 137 (CO 7). In the previous filing, this area was split between PEA 137 (CO 7) and PEA 136 (CO 6); and
- The geographic territory now constituting Yakutat City and Borough, Alaska is included in PEA 214 (AK 3). In the previous filing, this area was split between PEA 214 (AK 3) and PEA 213 (AK 2).

CCA, NTCA, RWA, and the Blooston Rural Carriers continue to believe that Cellular Market Areas (“CMAs”) are the most pro-competitive license size for spectrum auctions. However, if the Commission declines to use CMAs in the broadcast incentive auction, the PEA proposal (as revised herein) would be far preferable to an approach based on Economic Areas (“EAs”) alone.

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  
Competitive Carriers Association

*/s/ Jill Canfield*

Jill Canfield  
Director, Legal and Industry & Assistant  
General Counsel  
NTCA – The Rural Broadband Association

*/s/ Caressa D. Bennet*

Caressa D. Bennet  
General Counsel

*/s/ John A. Prendergast*

John A. Prendergast  
Managing Partner

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Association; and John A. Prendergast, Managing Partner, Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 12-268, 13-185 (filed Mar. 11, 2014).

Rural Wireless Association, Inc.

Blooston, Mordkofsky, Dickens, Duffy &  
Prendergast, LLP

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Mr. Brett Tarnutzer  
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