



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

March 20, 2014

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 18, 2014, I had telephone conversations with John Leibovitz, Deputy Chief of the Wireless Telecommunications Bureau, and Renee Gregory, Legal Advisor to Chairman Tom Wheeler; and Kathleen Ham, Vice President, Federal Regulatory Affairs, of T-Mobile US, Inc. ("T-Mobile") had a telephone conversation with Roger Sherman, Chief of the Wireless Telecommunications Bureau. On March 19, Ms. Ham and I spoke with Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn. Each conversation concerned the above-referenced proceeding.

We noted the benefits of licensing the AWS-3 spectrum in smaller spectrum blocks and smaller geographic areas. 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,^{1/} 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

^{1/} 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).

requirements and will better facilitate competitive carriers supplementing their existing AWS-1 spectrum holdings. While it has recently changed its advocacy, AT&T has recognized that “[t]he Commission’s proposal to assign the AWS-3 spectrum at 1755-1780 MHz and 2155-2180 MHz in paired 5 x 5 MHz blocks enjoyed broad support.”^{2/} While press reports indicate that the Commission is considering creating two 10x10 megahertz spectrum blocks, no carrier explicitly supported that plan.

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 the Commission staff copied below. 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: (each electronically)
Roger Sherman
John Leibovitz
Renee Gregory
Louis Peraertz

^{2/} Reply Comments of AT&T, GN Docket No. 13-185, at 7 (filed Oct. 28, 2013).