March 24, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

The undersigned, a group comprised of parties who have participated in FCC wireless auctions as designated entities (DEs), support the Minority Media and Telecommunications Council's (MMTC's) advocacy for increasing the level of bidding credits for DEs to 40%.[1] This change is critical to promote meaningful DE participation in future FCC auctions, most notably the upcoming AWS-3 and 600 MHz spectrum auctions.

In recent years DE participation in major spectrum auctions has languished. DEs won a meager 4 percent of spectrum by dollar value in Auction 66 in 2006, 2.6 percent in Auction 73 in 2008 and no spectrum licenses in Auction 96 in 2014.

MMTC's recommendation to increase the DE bidding credit to 40% is a necessary step to restoring small business participation in future FCC auctions. For the bidding credit, we propose specifically that the Commission increase by 15 percentage points the bidding credit levels that the Commission has utilized in recent spectrum auctions. Specifically:

(i) A DE bidder with attributable annual gross revenues that do not exceed an average of $40 million for the preceding three years receives a 30 percent discount on its winning bid.

(ii) A DE bidder with attributable annual gross revenues that do not exceed an average of $15 million for the preceding three years receives a 40 percent discount on its winning bid.

[1] See S. Jenell Trigg and Jeneba Jalloh Ghatt, Digital Déjà Vu: A Road Map for Promoting Minority Ownership in the Wireless Industry (Feb. 25, 2014) and MMTC's March 7, 2014 ex parte filing on GN-Docket No. 13-185

With the two upcoming large wireless spectrum auctions, the time for the Commission to act is now. The Commission must take action to encourage small business participation and facilitate new entrants into the wireless industry.

Sincerely,

/s/ Jonathan Glass
Jonathan Glass
Vice President
Council Tree Investors, Inc.

/s/ Vincent D. McBride
Vincent D. McBride
Managing Member
McBride Spectrum Partners

/s/ Stanley V. Campbell
Stanley V. Campbell
Chief Executive Officer
Business Intelligence Solutions
EagleForce Associates Inc.

/s/ David Miller
David Miller

/s/Gilbert H. Scott Sr.
Gilbert H. Scott, Sr.
Hurshell Associates
Former Owner and CEO of OVTC Inc.

/s/James P. McCarthy
James P. McCarthy
Holland Wireless LLC

/s/ Dave Wallace II
Dave Wallace II
Davey Holdings LLC

/s/ Randal J Odom
Randal J Odom
Chief Executive Officer
Piedmont Rural Telephone Cooperative, Incorporated