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April 24, 2014

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

Re: ***Notice of Ex Parte Presentation: Policies Regarding Mobile Spectrum Holdings,***  
WT Docket No. 12-269

Dear Ms. Dortch:

On April 22, 2014, Lawrence R. Krevor, Vice President, Legal and Government Affairs – Spectrum, Gardner Foster, Senior Counsel, Legal and Government Affairs, and the undersigned of Sprint Corporation (“Sprint”), and Kostas Liopiros of the Sun Fire Group LLC, consultant to Sprint, met separately with Renee Gregory, Legal Advisor to Chairman Wheeler, and Roger Sherman, Chief of the Wireless Telecommunications Bureau; Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly; and David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel. On April 24, the same Sprint representatives met with Brendan Carr, Legal Advisor to Commissioner Ajit Pai.

In each meeting, Sprint discussed the necessity of refining the Commission’s spectrum screen to reflect the varying competitive utility of different bands for mobile broadband. Sprint reiterated points consistent with its recent filings, emphasizing that the overwhelming weight of the record demonstrates the necessity of distinguishing among bands contained in the screen. Sprint noted that proposals to include the vast majority of the 2.5 GHz band, without significant reductions to reflect the encumbrances to broadband deployment (over and above the educational reserve and white spaces), would produce counter-intuitive results under the screen. This outcome would render the proposed revised screen ineffectual in diagnosing the potential for undue market power and thus would not assist the Commission in identifying transactions warranting in-depth competitive review. Moreover, as proposed the revised screen would contravene the public interest by facilitating the ability of the most dominant firms to bolster their already-dominant spectrum holdings.

Pursuant to Section 1.1206 of the Commission’s rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

*/s/ Rafi Martina*

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Rafi Martina

Attorney

Legal and Government Affairs

Sprint Corporation

cc: (via e-mail)  
Renee Gregory  
Roger Sherman  
Erin McGrath  
David Goldman  
Brendan Carr