



April 28, 2014

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

Re: United States Cellular Corporation

Re: Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269;
Expanding the Economic and Innovation Opportunities of Spectrum Through
Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral *ex parte* presentation in connection with the above-captioned proceedings. On April 24, 2014, the undersigned spoke by phone with Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn.

During the course of that conversation, I expressed support for Wireless Bureau/Incentive Auction Task Force proposals in these dockets in relation to:

- the use of PEAs as the geographic license area size
- requirements for interoperability of devices deployed across 600 MHz
- the proposed band plan configuration
- a recommendation against the use of package bidding

I also expressed U.S. Cellular's concerns regarding certain aspects of the proposed decision in the Mobile Spectrum Holdings proceeding to the extent that those proposals would have the effect of prohibiting U.S. Cellular from acquiring "restricted spectrum" (spectrum set aside under the proposal for carriers with less than 45 MHz of low band spectrum in licensed areas) across a substantial portion of its licensed operating footprint. Such a proposal would place U.S. Cellular at a significant disadvantage to at least three of the four national carriers in acquiring

the spectrum likely necessary for the deployment of 5G technology in the next decade in its operating markets, notwithstanding the fact that U.S Cellular is not a national carrier. As drafted, carriers holding 44 MHz of low band spectrum could acquire unlimited additional amounts of restricted spectrum in an auction (as well as unlimited amounts of unrestricted spectrum), while carriers holding 45 MHz could not acquire any additional restricted spectrum.

I expressed support for the Competitive Carriers Association proposal to adopt a national eligibility requirement that would first assess nationwide spectrum holdings in the aggregate before applying a market by market spectrum holdings analysis. I also indicated that addressing the national eligibility requirement was the Company's top regulatory priority.

Sincerely,

/S/

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

Louis Peraertz (Louis.peraertz@fcc.gov)