

Communications  
Workers of America  
AFL-CIO, CLC

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April 21, 2014

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

**RE: Ex Parte Notice. Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions, GN Docket No. 12-268; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269.**

On Thursday, April 17, Debbie Goldman, Communications Workers of America, participated in a group meeting with Chairman Thomas Wheeler and FCC staff members of the Incentive Auction Task Force to discuss the above-captioned proceeding.

As CWA understands it, the FCC staff has proposed that the forward spectrum auction be conducted in two stages. During the first stage, all bidders will participate in an open and unrestricted auction until a threshold price is reached. I stated that the threshold must be set at a significant and material level so all bidders are contributing fairly and equitably to the success of the auction.

I further stated that to the extent the Commission imposes restrictions after the threshold is reached, the restrictions cannot be so limiting so as to deny any bidder a fair opportunity to reach a rational and efficient footprint in the 600 MHz band. Carriers must invest billions of dollars to develop equipment for and to deploy an LTE network in a new spectrum band. All carriers participating at auction should therefore be provided a fair opportunity at all stages of the auction to achieve a geographically significant 10 x 10 MHz footprint to support efficient LTE deployment in the band.

Sincerely,

A handwritten signature in black ink that reads 'Debbie Goldman'. The signature is written in a cursive, flowing style.

Debbie Goldman  
Telecommunications Policy Director  
Communications Workers of America

cc: Ruth Milkman, Renee Gregory, Gary Epstein, Gigi Sohn