



Competitive Carriers Association
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May 13, 2014

Via ECFS

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

**RE: EXEMPT EX PARTE PRESENTATION PURSUANT TO 47 C.F.R. §§
1.1203(a)(1), 1.1204(a)(10)**

GN Docket No. 12-268: *Expanding the Economic and Innovation Opportunities of Spectrum
Through Incentive Auctions*

WT Docket No. 12-269: *Policies Regarding Mobile Spectrum Holdings*

Dear Ms. Dortch:

On May 13, 2014 at approximately 2:30 PM ET, I spoke by phone with Louis Peraertz, Legal Advisor for wireless, international and public safety issues to Commissioner Clyburn, regarding CCA's position on interoperability in the 600 MHz spectrum and whether its members support using quasi-random assignment to ensure interoperability in the 600 MHz Band.¹ I reiterated CCA's previously stated position that the Commission should mandate interoperability throughout the 600 MHz Band.² Ensuring interoperability will promote greater device availability, expanded roaming partnerships and a healthier ecosystem overall—which helps to explain why the proposal for mandated interoperability enjoyed broad support in the record.³ I similarly stated that while quasi-random assignment is not a substitute for mandated interoperability, it would likewise help alleviate interoperability concerns in the event the Commission adopts some form of blind bidding for the 600 MHz auction.⁴

In addition to interoperability, Mr. Peraertz and I discussed CCA's proposed nationwide eligibility requirement to access reserved spectrum in the upcoming incentive auction and whether it

¹ *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268, Notice of Proposed Rulemaking, 27 FCC Rcd 12357 (2012); *see also Policies Regarding Mobile Spectrum Holdings*, WT Docket No. 12-269, Notice of Proposed Rulemaking, 27 FCC Rcd 11710 (2012).

² *See* Reply Comments of Competitive Carriers Association, GN Docket No. 12-268 at 9 (filed Mar. 12, 2013).

³ *See id.* at 10-12 (citing comments).

⁴ *Id.* at 9.

would be “generally applicable” to all auction participants. CCA has previously provided evidence of the general applicability of its proposal in this proceeding, including most recently its May 2nd *ex parte* notice.⁵

This notice is being filed electronically with your office pursuant to Sections 1.1204(a)(10)(iv) and 1.1206(b)(2)(v) of the Commission’s Rules.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
General Counsel

⁵ See, e.g., *Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA to Marlene H. Dortch, Secretary, FCC, Docket Nos. 12-268 & 12-269 at 2 (filed May 2, 2014); see also *Ex Parte* Letter from Steven K. Berry, President & CEO, CCA to The Hon. Julius Genachowski, Chairman, FCC *et al.*, Docket Nos. 12-268 & 12-269 (filed May 9, 2013).