June 17, 2014

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

Re: Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:


During the conversation, Dr. Kearns described a study that sheds light on the scope of broadcaster participation needed at various clearing targets. The study examines various scenarios both with and without the Commission’s domain constraints and highlights both the possibilities and the challenges of the repacking process. The study is designed to illustrate the structure and constraints of the solution space of feasible repackings. Specifically, the analysis is “mechanism free,” in that it identifies constraints that must hold, regardless of the auction mechanism chosen or the prices offered to broadcasters. The attached presentation was used to facilitate the discussion. The Kearns/Dworkin white paper is also attached for inclusion in the record.

In accordance with the Commission’s rules, this letter is being filed electronically with the Secretary for inclusion in the public record.

Sincerely,

/s/ Brian J. Benison

cc: Gary Epstein  Evan Kwerel  Edward Smith
A. J. Glusman  Brett Tarnutzer  Melissa Dunford
Martha Stancil  Sasha Javid  Julius Knapp
Aspasia, Paroutsas  Matthew Hussey  Bob Weller