

Tamara Preiss
Vice President
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July 16, 2014

Ex Parte

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

Re: Auction of Advanced Wireless Services Licenses Scheduled for November 13, 2014, Comment Sought on Competitive Bidding Procedures for Auction 97, AU Docket No. 14-78; Petition of DirectTV Group, Inc. and EchoStar, LLC for Expedited Rulemaking to Amend Sections 1.2105(a)(2)(xi) and 1.2106(a) of the Commission's Rules and/or for Interim Conditional Waiver, RM-11395

Dear Ms. Dortch:

On July 14, 2014, Tamara Preiss and Catherine Hilke of Verizon spoke by telephone with John Leibovitz, Deputy Chief of the Wireless Telecommunications Bureau; Brian Regan, Senior Legal and Policy Advisor; and Margaret Wiener, Chief, Auctions and Spectrum Access Division. We discussed Verizon's views on procedures for the AWS-3 auction, scheduled to begin on November 13, 2014. The discussion was consistent with Verizon's comments and reply comments.¹

In particular, we stressed potential bidders' need for certainty about the timing of post-auction payments and asked the Bureau to set dates certain in January 2015 for the down and final payments. We also reiterated our support for requests to waive application of the former defaulter rule for certain prior debts – any debt that was resolved more than three years before the application deadline or any debt that is less than the lesser of \$100,000 or 0.1% of the applicant's average annual revenues. Verizon also supports delay of the short-form application filing deadline until late September to allow potential bidders to participate in industry events.

We also discussed procedures for the conduct of the auction itself. Verizon supports the retention of anonymous bidding, consistent with prior auctions, but we oppose Dish's proposal to bifurcate the auction into two separate auctions, one for the 1695-1710 MHz band and another for the paired spectrum at 1755-1780/2155-2180 MHz. We explained that this proposal will

¹ See *Auction of Advanced Wireless Services Licenses Scheduled for November 13, 2014, Comment Sought on Competitive Bidding Procedures for Auction 97, AU Docket No. 14-78, Comments of Verizon Wireless* (filed June 9, 2014), *Reply Comments of Verizon Wireless* (filed June 23, 2014).

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needlessly complicate the auction, requiring FCC staff and bidders to track bidding eligibility, activity waivers, and stopping rules separately for two auctions, and we questioned Dish's assumption that the two bands are not substitutes for one another. Finally, we reiterated our request for the Bureau to reduce the minimum acceptable bid percentage, the minimum opening bids, and eligibility amounts. Each of these changes will encourage broad participation in the auction and thus contribute to its success.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jonathon Green".

cc: (via e-mail)

John Leibovitz
Brian Regan
Margaret Wiener