



July 30, 2014

VIA ELECTRONIC FILING

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

Re: Ex Parte Notice, WT Docket 02-55

Dear Ms. Dortch:

On January 22, 2013, Sprint Corporation (“Sprint”) filed a Petition for Declaratory Ruling in the above-captioned proceeding.¹ Sprint’s Petition sought a determination that Sprint’s expenditures to facilitate 800 MHz band reconfiguration already significantly exceed the \$2.8 billion required to avoid an “anti-windfall” payment to the U.S. Treasury. Sprint also requested elimination of the \$850 million minimum amount or “floor” for the 800 MHz Letter of Credit Sprint obtained to secure its 800 MHz band reconfiguration funding obligations. Sprint’s Petition remains pending.

Sprint’s Petition estimated that as of December 31, 2012 its remaining 800 MHz expenses subject to the 800 MHz Letter of Credit were approximately \$456 million, based on then-signed Frequency Reconfiguration Agreements (“FRAs”) (\$309 million) and forecasted expenses for U.S. – Mexico Border Area FRAs which had yet to be negotiated (\$147 million).² The Public Safety and Homeland Security Bureau has offered Sprint an opportunity to update that estimate.

As of March 31, 2014, Sprint estimates that the costs directly associated with completing the reconfiguration of all 800 MHz licensees will be \$331.3 million or less. This number is based on the forecasts submitted to the 800 MHz Transition Administrator (“TA”) and reflects the amounts remaining unpaid under executed contracts as well as an estimate based on the TA metrics for the small number of licensees in the U.S. - Mexican border not yet under contract.

¹ See Petition for Declaratory Ruling filed by Sprint Nextel Corporation, WT Docket 02-55 (filed Jan. 22, 2013) (“Sprint Petition”).

² *Id.* at Appendix B.

Pursuant to Section 1.106 of the Commission's Rules, Sprint hereby files this *ex parte* letter into the docket of the above-referenced proceeding.

Sincerely,

[/s/ James B. Goldstein](#)

James B. Goldstein
Senior Counsel – Legal and Government Affairs
Sprint Corporation

cc: Michael Wilhelm, PSHSB