VIA ELECTRONIC FILING

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

Re: Comment Sought on Defining Commencement of Operations in the 600 MHz Band (GN Docket No. 12-268)

Dear Ms. Dortch,

On Monday, October 5, 2015, CTIA – The Wireless Association® (“CTIA”) and its members met with Chanelle Hardy, Chief of Staff and Media Legal Advisor from the Office of Commissioner Mignon Clyburn to discuss the above-referenced proceeding. A list of attendees is included as Appendix A to this ex parte filing. During the meeting, CTIA discussed significance of the definition of “commence operations” to the timely deployment of mobile broadband in the new 600 MHz band as described in its letter of September 9, 2015.

CTIA asked the Commission to define “commence operations” in a manner that would allow for limited but necessary market testing. As a result, low-power television and unlicensed users of the UHF band will be able to remain in operation in the 600 MHz band even after it is reallocated and licensed to others, while 600 MHz licensees will gain access to their licensed spectrum as necessary to “commence service,” including the pre-requisite market and commissioning testing steps that must precede a commercial launch. Under this proposal, secondary users could continue to utilize the mobile wireless band in the vast majority of areas beyond the market testing stage, until pre-commercial launch testing necessitates the use of the mobile wireless band for mobile wireless service.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs
CTIA – The Wireless Association®

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1 See Letter from Scott K. Bergmann, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Sept. 9, 2015).
APPENDIX A
October 5, 2015 Meeting Participants

CTIA – The Wireless Association®
Scott Bergmann, Vice President, Regulatory Affairs, CTIA
Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (for CTIA)

CTIA Member Company Representatives
Brian Benison, AT&T
Chris Wieczorek, T-Mobile
Grant Spellmeyer, U.S. Cellular
Robert Morse, Verizon

Federal Communications Commission – Office of Commissioner Mignon Clyburn
Chanelle Hardy, Chief of Staff and Media Legal Advisor