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, September 21, 2015, CTIA – The Wireless Association® (“CTIA”) and its members met separately with representatives from the offices of Commissioners Jessica Rosenworcel, Ajit Pai, and Michael O’Rielly to discuss the above-referenced proceeding. A list of attendees is included as Appendix A to this ex parte filing. During the meetings, 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, 2015¹, and the importance of the FCC to provide the opportunity to stakeholders for multiple auction simulations.

First, CTIA explained that our compromise proposal for the definition of “commence operations” largely accepts the FCC’s proposed definition of site commissioning testing as described in its March 2015 Public Notice, but 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.

Second, consistent with CTIA’s prior advocacy,² CTIA also urged the Commission to provide for multiple auction simulations to give interested parties the opportunity to test the Commission software and understand the data provided to them during the auction process. CTIA explained that auction applicants will require additional testing of FCC and applicant-designed bidding software through simulations prior to the start of the 600 MHz incentive auction – necessitating more than just a single, formal mock auction.

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).

² See Letter from Scott K. Bergmann, Vice President, Regulatory Affairs, CTIA, to Gary Epstein, Chair, and Howard Symons, Vice-Chair, Incentive Auction Task Force, FCC, GN Docket No. 12-268 (filed Aug. 24, 2015).
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®
APPENDIX A
September 21, 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
Richard Engelman, Sprint (by phone)
Steve Sharkey, T-Mobile
Grant Spellmeyer, U.S. Cellular (Commissioners Rosenworcel and Pai meetings only)
Robert Morse, Verizon

Federal Communications Commission – Office of Commissioner Jessica Rosenworcel
Johanna Thomas

Federal Communications Commission – Office of Commissioner Ajit Pai
Brendan Carr

Federal Communications Commission – Office of Commissioner Michael O’Rielly
Erin McGrath