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April 18, 2012

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, DC 20554

Re: Ex Parte Communication – WT Docket 12-4 and WT Docket No. 12-21

Dear Ms. Dortch:

On behalf of T-Mobile USA, Inc. (“T-Mobile”), and pursuant to Section 1.1206 of the Commission’s Rules, 47 C.F.R. § 1.1206, this is to provide notice of an *ex parte* meeting held on April 16, 2012, in connection with WT Docket No. 12-4. The meeting was attended by Kathleen O’Brien Ham, Vice President, Federal Regulatory Affairs of T-Mobile, and Peter Cramton, Professor of Economics, University of Maryland (together, the “T-Mobile Representatives”). The T-Mobile Representatives met with Marius Schwartz and Evan Kwerel of the Commission’s Office of Strategic Planning & Policy Analysis (together, the “FCC Representatives”).

During the meeting, the T-Mobile Representatives discussed the matters raised in T-Mobile’s Petition to Deny filed on February 21, 2012, and Reply to Opposition filed on March 26, 2012 in WT Docket No. 12-4. In particular, they discussed the need for the Commission to update the spectrum screen in evaluating Verizon Wireless’ proposed acquisition of spectrum from SpectrumCo and Cox in order to eliminate its chief flaw: the fact that it treats all mobile broadband spectrum as equal even though low-band spectrum is in fact significantly more valuable for providing wireless broadband services. They also discussed the fact that two carriers (Verizon and AT&T) currently hold the vast majority of the low-band spectrum. Finally, they discussed the fact that, unlike T-Mobile and other wireless carriers, Verizon Wireless has not used its AWS spectrum in the six years it has held the licenses, and that the instant transactions would add additional AWS spectrum to Verizon Wireless’ inventory and keep this scarce spectrum from being used by its competitors. The T-Mobile Representatives also discussed the attached chart, which shows the coverage for three different bands (800 MHz, 1800 MHz, and 2.6 GHz) as a function of the number of cell sites to achieve a downlink speed of at least 1.2 Mbps with 20 MHz of spectrum, and demonstrates that even with 10 times the number of cell sites, the 2.6 GHz band is unable to match the coverage of 800 MHz.

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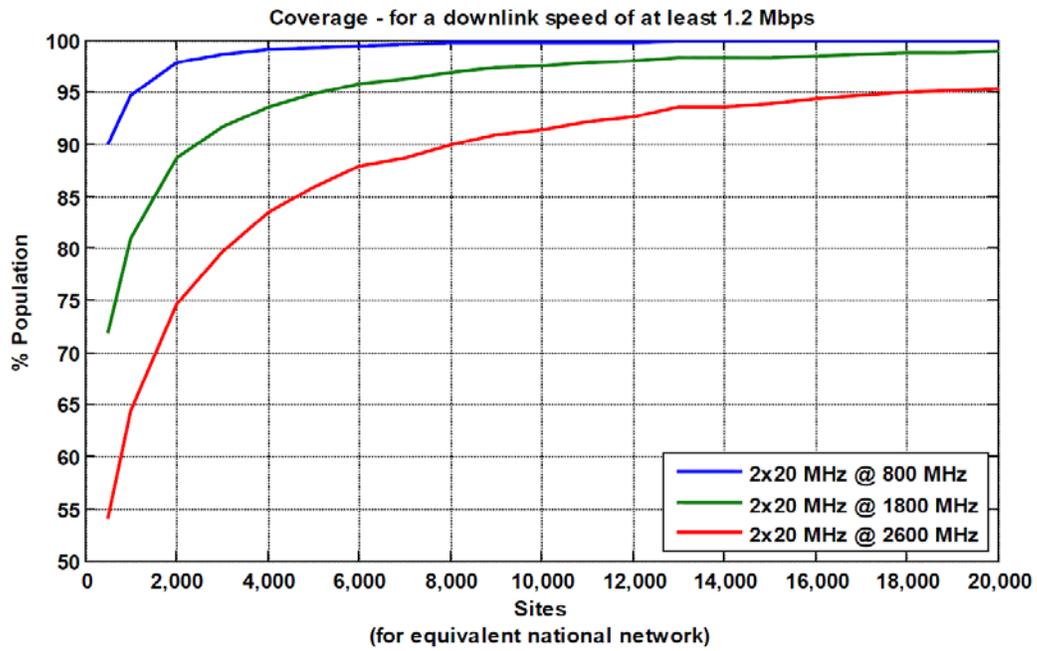
Should any additional information be required with respect to this *ex parte* notice, please do not hesitate to contact me.

Very truly yours,

*/s/ Jean L. Kiddoo*

Jean L. Kiddoo  
Counsel to T-Mobile USA, Inc.

Attachment  
cc (by email): FCC Representatives  
T-Mobile Representatives



Coverage as a function of the number of sites for three different bands.

*Source: Ofcom's second consultation on assessment of future mobile competition and proposals for the award of 800 MHz and 2.6 GHz spectrum and related issues (2012).*