

***Advocacy Submits Comments to FCC regarding
Small Business Participation in Spectrum Auctions***

On June 8, 2015 Advocacy filed a notice of *ex parte* meeting with the FCC detailing a meeting on June 4, 2015, at which Assistant Chief Counsel for Advocacy Jamie Saloom met with staff in the FCC's Wireless Telecommunications Bureau. During the meeting, Advocacy discussed ways in which the FCC can amend its rules to improve its auction policies to encourage greater competition and small business entry and growth in the wireless marketplace.

Advocacy expressed strong support for the use of small business credits in spectrum auctions, and encouraged the FCC to incentivize further small business participation in its future auctions by updating some of its competitive bidding rules. Advocacy also cautioned against adopting measures that would result in decreased competition and participation by small businesses.

Advocacy specifically recommended that the FCC:

- eliminate its Attributable Material Relationship (AMR) rule, and evaluate DE eligibility using a case by case approach to determine whether an eligible small business licensee retains control over the spectrum for which it received small business benefits;
- allow DEs more flexibility, not less, in their ability to lease spectrum;
- limit the availability of bidding credits to small entities, as defined by SBA-approved size standards; and
- decline to institute arbitrary caps on DE credits.

For further information, please contact Jamie Belcore Saloom at 202/205-6890 or Jamie.Saloom@sba.gov.