



May 7, 2014

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

**Re: Expanding the Economic and Innovation Opportunities of  
Spectrum Through Incentive Auctions – GN Docket No. 12-268**

Dear Ms. Dortch:

In order to advance America's position as the undisputed leader of the world's innovation economy, one thing is clear: More spectrum must be unleashed to continue fueling the mobile revolution. Our goal as a nation should be to make as much new spectrum available for consumer use as quickly as possible in order to best serve skyrocketing consumer demand. We write, therefore, to encourage the FCC to proceed as rapidly as possible to implement the spectrum provisions of the Middle Class Tax Relief and Job Creation Act of 2012 and to hold an auction that allows all bidders to participate on equal terms. An auction open to all bidders will encourage broadcaster participation, maximize Federal Government revenue and greatly benefit the technology community, consumers and the American public.

CALinnovates and the undersigned work every day with innovative technologies that influence how people work, communicate and enjoy the world in which we live. CALinnovates provides a voice to technology companies in the policy debate, and spectrum policy is both an immediate and long-term issue that will have a drastic effect on these companies, their investors, their consumers and the economy. CALinnovates members *all* rely upon the availability of wireless spectrum to ensure that its customers can effectively and seamlessly access and utilize all products and services. Given the

challenges and complexities of holding the auction that Congress required, it is important to move forward as quickly as possible to allow this spectrum to be utilized at its highest and best use by the marketplace.

While the needs of the technology community are clear at this juncture, the specific rules of the auction are not. It is imperative to conduct an auction in which all potential bidders are able to bid for spectrum without restriction, to enable spectrum to reach its full market price and encourage broadcasters to make their spectrum holdings available. We must avoid placing restrictions on the auction, as restrictions will have an adverse, palpable effect on the nation's innovation economy.

Only an auction open to all bidders with no limitations will ensure maximum auction proceeds. Such an outcome will provide the necessary incentive to bring broadcasters to the bidding table and have a positive effect on the Federal Government's finances, which will in turn benefit the economy as a whole, as well as fund the build of FirstNet, the much-needed 21<sup>st</sup> Century public safety broadband network.

By contrast, conditioning the auction to artificially limit prospective bidders while favoring others will provide a sharp disincentive for broadcasters to voluntarily divest their spectrum holdings for fear they will not maximize their return. These are the very broadcasters that are necessary participants to make this auction not just successful, but also possible.

This is a critical crossroads for the technology community. Our future growth is inextricably intertwined with the outcome of this spectrum auction, and failure is not an option. The technology ecosystem relies upon robust networks – all networks – to deliver its products and services to the masses, which necessitates structuring the auction in a way that no willing bidder be excluded, or favored.

Additional spectrum will itself be an important catalyst for economic growth in the high tech community and throughout the economy. Startups, not just in California but across the nation, rely upon strong mobile networks. An effective and efficient spectrum auction will lead to greater investment in our communications infrastructure, enabling advanced services, the capacity to support increasing demand from business and consumers, and better quality of service.

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Only an auction that enables all bidders to participate fairly and on equal terms will generate the needed amount of broadcaster interest, available spectrum, the most revenue and the greatest business and consumer benefit. With an open spectrum auction, the United States will be able to maintain its global competitiveness and continue the tradition of innovation for which Silicon Valley and California are known the world over.

Respectfully,

**/s/ Mike Montgomery**

Mike Montgomery  
Executive Director  
CALinnovates

**/s/ Danny Boice**

Danny Boice  
Co-Founder & CTO  
Speek

**/s/ Josh Bradley**

Josh Bradley  
Director of Marketing & Platform Satisfaction  
TRAIL

**/s/ Daniel Brusilovsky**

Daniel Brusilovsky  
Entrepreneur

**/s/ Christopher Roy Correa**

Christopher Roy Correa  
Co-Founder, SVP Business Development  
Conjectur

**/s/ Jack Crawford**

Jack Crawford  
General Partner  
Velocity Venture Capital

**/s/ Mark Daniel**

Mark Daniel  
Entrepreneur

**/s/ Stacey Ferreira**

Stacey Ferreira  
Entrepreneur

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**/s/ Scott Krantz**

Scott Krantz  
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**/s/ Lloyd Marino**

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**/s/ Taylor Peck**

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**/s/ Michael Perry**

Michael Perry  
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**/s/ Brian Purchia**

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**/s/ Yo Yoshida**

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