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October 1, 2018

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

Re: **Wireless Internet Service Providers Association  
Promoting Investment in the 3550-3700 MHz Band  
GN Docket No. 17-258  
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On September 27, 2018, Jeff Kohler, a member of the Board of Directors of the Wireless Internet Service Providers Association (“WISPA”) and Chief Development Officer of JAB Wireless, Inc., and undersigned counsel to WISPA met with Will Adams, Legal Advisor to Commissioner Brendan Carr, to discuss certain aspects of the above-referenced proceeding.<sup>1</sup>

Mr. Kohler emphasized the need for broadband providers operating in rural communities to have access to Priority Access Licenses (“PALs”) in every market based on census tracts. Mr. Kohler explained that investors are more willing to invest in companies that hold licensed spectrum than they would in companies that hold only unlicensed or “license by rule” General Authorized Access spectrum, which would accelerate broadband deployment. Mr. Kohler also stated that the ability of his company and other small providers to use LTE-based equipment in the CBRS band would extend the life of fixed wireless access points, lower customer premise equipment costs, and thereby reduce the long-term total cost of ownership. In sum, licensed PAL spectrum “right-sized” for rural fixed broadband deployments would improve the overall business case and make capital investment more accessible.

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<sup>1</sup> See *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking and Order Terminating Petitions, 32 FCC Rcd 8071 (2017).



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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Will Adams