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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte, *Transforming the 2.5 GHz Band*, WT Docket No. 18-120

Dear Ms. Dortch:

On Tuesday, October 2, 2018, Clifford Agee and Josh Snow of Trace Fiber Networks, wholly-owned subsidiary of the Chickasaw Nation, and their counsel, Clare Liedquist and the undersigned with Herman & Whiteaker, LLC, met with Commissioner Michael O'Rielly and Kagen Despain, legal intern, of the Federal Communications Commission ("FCC" or "Commission"). During the meeting, the parties discussed the importance of the *Transforming the 2.5 GHz Band* proceeding, particularly for Tribal Nations such as the Chickasaw Nation.

Mr. Agee described the lack of broadband access to many Chickasaw Nation citizens and the Nation's determination to reach those under and unserved citizens. The Chickasaw Nation's territory extends across 13.5 counties in south-central Oklahoma, much of which is rural. Thus, providing quality broadband can be challenging and expensive and as a result, over sixty percent (60%) of Chickasaw residents do not have service that meets the FCC definition of broadband. Mr. Agee discussed the Nation's own efforts to bring its citizens broadband service, including substantial investments in a fiber loop and a partnership with a Wireless Internet Service Provider. Mr. Snow explained that the wireless network is very limited due to interference and propagation issues inherent in unlicensed spectrum and that access to licensed 2.5 spectrum could provide an enormous opportunity for the Chickasaw Nation to close the coverage gaps throughout the Nation.

Mr. Agee and Mr. Snow explained the difficulties associated with the participation of Tribal Nations to compete in auctions for licensed spectrum and expressed the importance of the local priority filing windows proposed in the NPRM. The local priority filing windows, particularly for Tribal Nations, will provide a rare opportunity to acquire valuable spectrum needed to provide coverage to unserved and underserved areas.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned dockets. Please contact the undersigned if you have any questions.

Respectfully submitted,



Donald L. Herman, Jr.
Clare Liedquist
*Counsel to Trace Fiber Networks & the
Chickasaw Nation*

Enclosure