



October 5, 2017

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354; Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258; Petition for Rulemaking of CTIA, RM-11788; Petition for Rulemaking of T-Mobile USA, Inc., RM-11789.

Dear Ms. Dortch,

On October 3, 2017, Scott Bergmann, Kara Romagnino Graves, and Jen Oberhausen of CTIA, along with CTIA members Stacey Black of AT&T, Gardner Foster of Sprint, and Patrick Welsh of Verizon, met with Don Stockdale, Nese Guendelsberger, Paul Powell, Matthew Pearl, and Jessica Greffenius of the Wireless Telecommunications Bureau to discuss the above-captioned proceedings.

During the meeting, CTIA expressed its support for the Commission moving forward with a Notice of Proposed Rulemaking seeking comment on targeted changes to the 3.5 GHz band rules in order to promote investment in the band.¹ CTIA emphasized the importance of the 3.5 GHz Citizen's Broadband Radio Service ("CBRS") band to the wireless industry and the band's growing importance in the 5G landscape, and explained that the proposals CTIA submitted in its Petition for Rulemaking in this proceeding were designed to maximize investment and innovation in this spectrum.

In particular, CTIA urged the Commission to move forward quickly to modify the Priority Access Licenses ("PALs") terms to a standard, ten-year term with an expectation

¹ See *Promoting Investment in the 3550-3700 MHz Band*, Draft Notice of Proposed Rulemaking, FCC-CIRC1710-04, GN Docket No. 17-258 (rel. Oct. 3, 2017).



of renewal, which would give licensees greater certainty and encourage investment; expand the PAL license area in order to reduce auction complexity, interference concerns, and administrative burdens on the Commission, licensees, and Spectrum Access System Administrators; remove unnecessary disclosure requirements for Citizen's Broadband Radio Service Device ("CBSD") registrations to reduce risks to personal privacy, proprietary information, and cyber and national security; and reexamine the out-of-band emission limits to facilitate wider bandwidth operations. Reforming the CBRS framework in these ways will help unlock the benefits that 5G will bring to the U.S. economy by providing faster speeds and additional bandwidth needed to support the Internet of Things.²

Importantly, CTIA noted that moving forward with these proposals can be done without delaying access to the 3.5 GHz band or undermining General Authorized Access ("GAA") use. Instead, these targeted changes would improve the novel three-tier framework by increasing incentives for investment in PALs without affecting GAA access to the CBRS band or changing the flexible nature of the CBRS framework.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs

cc: Meeting attendees

² See *Smart Cities: How 5G Can Help Municipalities Become Vibrant Smart Cities*, Accenture Strategy (Jan. 2017), <https://www.ctia.org/docs/default-source/default-document-library/how-5g-can-help-municipalities-become-vibrant-smart-cities-accenture.pdf>; see also *Wireless Connectivity Fuels Industry Growth and Innovation in Energy, Health, Public Safety, and Transportation*, Deloitte and CTIA (Jan. 2017), http://www.ctia.org/docs/default-source/default-document-library/deloitte_20170119.pdf.