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January 8, 2018

Ex Parte

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

Re: GN Docket No. 17-258
GN Docket No. 17-183

Dear Ms. Dortch:

On September 18, 2017, Kalpak Gude, President of the Dynamic Spectrum Alliance (DSA) met with Erin McGrath, Wireless and International Advisor to Commissioner Michael O’Rielly, regarding the above-listed proceedings.

Regarding the CBRS NPRM, Mr. Gude raised the points in the DSA Comments regarding PAL terms and geographic areas. DSA continues to believe that the PAL structure under the current rules should be maintained to ensure that current investment is not harmed and that deployment can happen quickly. The current three-year terms are better connected to return on investment than the ten-year terms as mentioned in the NPRM, and that renewability is counterproductive to the goals the Commission has articulated for the band. Both changes would create a need for more regulatory oversight in terms of build-out requirements and enforcement. Shorter terms with no right of renewal will allow for a much more market driven structure.

On the issue of geographic area, the DSA believes that PEAs would convert PALs to large carrier-only licenses and would significantly harm the interests of so many new entrants seeing to invest and deploy infrastructure in the band. Allowing PEA-sized PALs and then enabling disaggregation would be a costly and inefficient way to ensure PALs for all interested parties. DSA believes that smaller PALs with the ability to aggregate is a better way forward.

Regarding the Mid-Band NOI, Mr. Gude stressed the importance of the FCC conducting a data collection to determine the actual usage of satellite services in the band, prior to the FCC moving forward with changes to the current rules in the 3.7-4.2 GHz band.

Respectfully submitted,

Kalpak Gude
President
Dynamic Spectrum Alliance