

October 11, 2021

Hon. Jessica Rosenworcel  
Acting Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: *Written Ex Parte Communication***

**WT Docket No. 18-120**, *Transforming the 2.5 GHz Band*  
**AU Docket No. 20-429**, *Auction of Flexible-Use Service Licenses in the 2.5 GHz Band for Next-Generation Wireless Services*

Dear Acting Chairwoman Rosenworcel:

The Commission has over 8,000 mid-band licenses in its inventory for which it should immediately schedule an auction. This mid-band spectrum can help support 5G networks. While that was always a national priority, it is now even more critical as Americans – especially those in rural and underserved areas – have turned to wireless networks to telework, take advantage of distance learning, and receive health care remotely. Our companies’ networks are being asked to handle even more traffic that can be supported by 2.5 GHz spectrum.

The Commission adopted rules for the 2.5 GHz band more than two years ago and proposed procedures to auction the spectrum over nine months ago. Many of the licenses that the Commission will auction in the 2.5 GHz band cover rural and underserved areas. And because the licenses will be offered on a county basis, there is a real opportunity for smaller entities, like our companies, to win those licenses at auction. In fact, in the last auction the Commission conducted that offered county-based licenses, *i.e.*, the 3.5 GHz band auction, 348 entities sought to participate, and 228 entities won a total of 20,625 licenses.

The auction procedures that the Commission will adopt should feature the familiar simultaneous multiple round, or “SMR” bidding – the type of bidding in which small and rural carriers have often participated. The Commission should not use the untested single-round-pay-as-bid bidding procedures, which has substantial flaws that will have particularly negative impacts on our companies. A single round bid does not allow for price discovery. That is critical because there is little public information on the value of this spectrum, especially the value assigned by small companies, so it will be hard to know what a winning bid will be until we see others’ bids. Price discovery is also important because the licenses in the 2.5 GHz auction are unique due to different levels of incumbency – even within markets. While we may be able to guess at license values, that’s all bids would be and those guesses could result in significant underbidding or overbidding, meaning we could lose out on some important licenses while winning others not as important. Those results could be avoided by the price discovery available in an SMR auction.

We were encouraged by your remarks this summer supporting President Biden’s Executive Order on Promoting Competition in the American Economy, and note that you are a member and

recently attended the inaugural meeting of the White House Competition Council. One way you can help meet President Biden's goal is to make more spectrum available – particularly mid-band spectrum like the 2.5 GHz band – to enable competition. We therefore urge you to help us help the American people by immediately scheduling an auction for the 2.5 GHz band using an SMR bidding format. We look forward to continuing to work with you on this essential matter.

Sincerely,

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/s/  
Mark Nazé  
CEO  
Cellcom

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/s/  
Chip Damato  
Executive Vice President  
Inland Cellular

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/s/  
Dr. Michel Guité  
President  
VTel Wireless, Inc.

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/s/  
Ben Moncrief  
Senior Vice President,  
Strategic Relations  
C Spire

\_\_\_\_\_  
/s/  
Maureen Moore  
Chief Customer Experience  
Officer  
GCI Communications Corp.

\_\_\_\_\_  
/s/  
Jonathan D. Foxman  
President and CEO  
MTPCS, LLC d/b/a Cellular  
One

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/s/  
Michael T. Prior  
President & CEO  
ATN International

\_\_\_\_\_  
/s/  
Brian Spurgeon  
General Manager  
Chat Mobility

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/s/  
David Tews  
President  
Indigo Wireless

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/s/  
Eric Woody  
Chief Technical and  
Operations Officer  
Union Wireless

\_\_\_\_\_  
/s/  
W. Allen Gillum  
CEO/General Manager  
East Kentucky Network, LLC  
d/b/a Appalachian Wireless

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/s/  
Von Todd  
Chief Executive of Corporate  
Strategy and Analytics  
HTC

\_\_\_\_\_  
/s/  
Slayton S. Stewart  
CEO  
Carolina West Wireless

\_\_\_\_\_  
/s/  
Ed Eichler  
President & CEO  
Thumb Cellular

\_\_\_\_\_  
/s/  
Frank DiRico  
President  
Viaero Wireless

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Roger Bundridge  
General Manager  
Northwest Missouri Cellular

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Rod Boss  
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/s/  
Jon Lightle  
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\_\_\_\_\_  
/s/  
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