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January 16, 2018

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

Re: **Wireless Internet Service Providers Association  
GN Docket No. 17-258  
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On January 11, 2018, on behalf of the Wireless Internet Service Providers Association (“WISPA”), Mark Radabaugh (FCC Committee Chair), Jimmy Carr (Legislative Committee Chair) and undersigned counsel to WISPA, met separately with (1) Nick Degani and Rachael Bender, legal advisors to Chairman Ajit Pai, and (2) Louis Peraertz, legal advisor to Commissioner Mignon Clyburn to discuss issues related to the above-referenced proceeding.<sup>1</sup>

In each meeting, the WISPA representatives affirmed that the Commission should not adopt Priority Access License (“PAL”) areas that are larger than census tracts. We also explained that adding a renewal expectancy would create PALs that would be essentially permanent. This would drive up the cost of PALs, act as a *de facto* authorization of spectrum warehousing and provide no ability for future use cases to acquire PALs that may be essential to their business plans. We suggested that the “foothold” credit suggested by Professor Paul Milgrom may be a means to enable incumbents to maintain PALs at subsequent auctions while also ensuring that there is a mechanism for license turnover that does not depend on inefficient secondary markets that have proved to be inaccessible to small providers.

At the meeting with Mr. Peraertz, Mr. Carr discussed the attached map.

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<sup>1</sup> *Promoting Investment in the 3550-3700 MHz Band; Petitions for Rulemaking Regarding the citizens Broadband Radio Service*, GN Docket No. 17-258, RM-11788 (Terminated) and RM-11789 (Terminated), FCC 17-134 (Oct. 24, 2017) (“*CBRS NPRM*”).



Marlene Dortch, Secretary  
January 16, 2018  
Page 2

This letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

/s/ Stephen E. Coran  
Stephen E. Coran

Enclosure

cc: Nick Degani  
Rachael Bender  
Louis Peraertz



## Unserved areas tend to straddle PEA boundaries

Dark blue lines:	PEA boundaries
Shading:	CAF-designated unserved area (in VA)