January 18, 2019

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122

Ex Parte Letter

Dear Ms. Dortch:

Learfield IMG College urges the Federal Communications Commission (“Commission”) to dismiss recommendations by T-Mobile USA, Inc. (“T-Mobile”) and the Competitive Carriers Association (“CCA”) to repurpose 300 MHz or more of 3.7-4.2 GHz band (“C-band”) spectrum for flexible use.[[1]](#footnote-1) These flawed proposals show complete disregard for the amount of spectrum needed to protect incumbent Fixed Satellite Service (“FSS”) operations in the band, which support, among other services, distribution of audio and video programming content to nearly 35,000 terrestrial radio and television stations across America.

Learfield IMG College along with the C-Band Alliance group proposed to repurpose 200 MHz of C-Band spectrum, including a guard band; however, neither T-Mobile nor CCA’s proposal would preserve nearly enough spectrum to support these critical incumbent FSS operations in the C-band. T-Mobile suggests the FCC auction all 500 MHz of the C-band for terrestrial mobile broadband, and at least 300 MHz in most markets. CCA advises clearing a minimum 320 MHz, including a 20 MHz guard band.

Learfield IMG College depends upon the broad coverage and cost-effectiveness of C-band satellite distribution to deliver our Statewide News, Farm and live Collegiate (NCAA) Sports event programming to nearly 1500 radio stations and enterprise networks across the United States. These services, when taken in combination with the multitude of audio and video programming carried on C-band satellites, require much more C-Band spectrum dedicated to satellite services than the T-Mobile and CCA proposals would allow.

Moreover, there is no suitable alternative to C-band. Ku- and Ka-band spectrum lack the capacity and operational performance characteristics to meet our quality and reliability requirements, and fiber networks have limited reach and are cost prohibitive. The FCC must preserve sufficient C-band spectrum – at least 300 MHz – to ensure continuation of incumbent FSS operations.

Because both the T-Mobile and CCA proposals would result in incumbent providers losing access to the cost-effective, high-quality distribution C-band satellite service upon which they rely, the proposals are simply not viable. Learfield IMG College urges the Commission to protect FSS use in the C-band and dismiss these proposals that threaten rural American consumers’ access to the broadband services they enjoy today.

Respectfully submitted,

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1. *See* Notice of Ex Parte, T-Mobile USA, Inc., GN Docket No. 18-122 (filed Dec. 13, 2018); Notice of Ex Parte, Competitive Carriers Association, GN Docket No. 18-122 (filed Dec. 20, 2018). [↑](#footnote-ref-1)