



October 12, 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; *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183; *Section 43.62 Reporting Requirements for U.S. Providers of International Services*, IB Docket No. 17-55; *2016 Biennial Review of Telecommunications Regulations*, IB Docket No. 16-131.

Dear Ms. Dortch,

On October 10 and 11, 2017, Scott Bergmann, Kara Romagnino Graves, and Jen Oberhausen of CTIA, along with CTIA members Stacey Black of AT&T, John Hunter of T-Mobile, and Patrick Welsh of Verizon, met separately with representatives from the Offices of Chairman Ajit Pai and Commissioners Mignon Clyburn, Brendan Carr, and Jessica Rosenworcel to discuss the above-captioned proceedings. A full list of attendees at each meeting is attached to this filing.

During the meetings, 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 global 5G landscape. CTIA also explained that the limited proposals in its Petition for Rulemaking in this proceeding

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).



were designed to maximize investment and innovation in this spectrum without undermining the novel three-tier spectrum framework that the Commission designed to encourage innovation in the band.

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 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. Making these targeted reforms to the CBRS framework will help unlock the benefits that 5G will bring to the U.S. economy—benefits that were not foreseen when this proceeding was originally undertaken—by providing faster speeds and additional bandwidth needed to support the Internet of Things.²

Importantly, CTIA noted that the Commission can move forward with these proposals 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.

Also during the meetings, CTIA commended the Commission for launching the Mid-Band Notice of Inquiry examining new opportunities for wireless services between 3.7

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.



and 24 GHz and encouraged the Commission to make additional mid-band spectrum available for mobile broadband.³

Finally, CTIA applauded the Commission for moving forward with its proposal to eliminate the international traffic and revenue reporting requirement for CMRS providers.⁴ As CTIA noted in its comments to the Commission,⁵ the reports impose extensive costs on providers yet are no longer necessary to monitor settlement rates and likely understate the competitiveness of the U.S.-international telecommunications services marketplace. CTIA therefore urged the Commission to remove this unnecessary regulation, which serves to divert providers' resources away from new or lower cost products and services and restricts innovation to the detriment of consumers.

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: Rachael Bender
Louis Peraertz
Kevin Holmes
Travis Litman

³ See *Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz*, Notice of Inquiry, 32 FCC Rcd 6373 (2017).

⁴ See *Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations*, Draft Report and Order, FCC-CIRC1710-06, IB Docket Nos. 17-55, 16-131 (rel. Oct. 3, 2017).

⁵ See Comments of CTIA, IB Docket Nos. 17-55, 16-131 (filed May 17, 2017).



ATTACHMENT

October 10, 2017 Meeting with the Office of Chairman Ajit Pai

FCC

Rachael Bender

CTIA and Members

Scott Bergmann, CTIA
Kara Romagnino Graves, CTIA
Jen Oberhausen, CTIA
Stacey Black, AT&T
John Hunter, T-Mobile
Patrick Welsh, Verizon

October 10, 2017 Meeting with the Office of Commissioner Jessica Rosenworcel

FCC

Travis Litman

CTIA and Members

Scott Bergmann, CTIA
Kara Romagnino Graves, CTIA
Jen Oberhausen, CTIA
Stacey Black, AT&T
John Hunter, T-Mobile
Patrick Welsh, Verizon



October 11, 2017 Meeting with the Office of Commissioner Mignon Clyburn

FCC

Louis Peraertz

CTIA and Members

Scott Bergmann, CTIA
Kara Romagnino Graves, CTIA
Stacey Black, AT&T
John Hunter, T-Mobile
Patrick Welsh, Verizon

October 11, 2017 Meeting with the Office of Commissioner Brendan Carr

FCC

Kevin Holmes

CTIA and Members

Scott Bergmann, CTIA
Kara Romagnino Graves, CTIA
Jen Oberhausen, CTIA
Stacey Black, AT&T
Patrick Welsh, Verizon