



October 12, 2018

**BY ELECTRONIC FILING**

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

Re: **NOTICE OF EX PARTE**  
**GN Docket No. 17-258: *Promoting Investment in the 3550-3700 MHz Band***

Dear Ms. Dortch:

As CEOs and senior-ranking officers representing wireless carriers serving consumers in cities, small towns, and rural, remote, and hard-to-reach areas throughout the United States, we commend the Federal Communications Commission ("FCC" or "Commission") for moving forward a draft Report and Order ("draft Order") in the above-mentioned proceeding. The FCC's draft Order seeks to revise existing rules governing

Citizens Band Radio Services (“CBRS”);<sup>1</sup> in particular by proposing to license Priority Access Licenses (“PALs”) at the county-level. The undersigned support this license assignment proposal and, therefore, urge the Commission’s swift adoption of the item at its next Open Meeting.

With the move towards next-generation technologies and 5G on the horizon, the time is ripe to adopt smart spectrum policies that promote investment and expedite deployment of advanced mobile broadband services to rural and remote corners of the country. To that end, non-nationwide carriers serving rural and regional consumers are actively engaged in the communities they serve, and require adequate license sizes to effectively utilize spectrum bands, resulting in a better consumer experience. We therefore support the FCC’s work to promptly finalize rules for valuable 3.5 GHz spectrum by licensing PALs by counties. County license sizes provide competitive carriers, especially those that serve rural areas, with a meaningful opportunity to bid on and acquire spectrum to provide these areas with the latest broadband services.

It is vital that policymakers continue to focus on freeing up spectrum at low-, mid-, and high-band frequencies to ensure carriers have an adequate portfolio for deployment. Mid-band spectrum, including 3.5 GHz, is critical to the business case for next-generation services. As the FCC’s draft Order explains, “the 3.5 GHz band has become one of the core mid-range bands for next-generation wireless internationally, including 5G.”<sup>2</sup> It is therefore critical that the FCC adopt geographic license sizes that adequately balance the need to protect against technological interference while providing for robust participation in a spectrum auction. Specifically, we support the Commission’s proposal to license each PAL by counties to “reduce spectrum management complexities, and mitigate interference risks at border area.”<sup>3</sup> This approach appropriately balances these interests and will ensure all carriers can use this slice of mid-band spectrum to effectively deploy next-generation technologies and 5G services in rural and remote areas.

Competitive carriers are key to bridging the digital divide in rural America. The ability to enhance and invest in our networks will pay dividends for unserved and underserved consumers in rural America. The Commission’s draft Order will help all Americans, especially those living, working, and travelling in rural parts of the country, to eventually obtain access to the 5G services that will revolutionize modern American life. We thank the Commission for its work thus far and look forward to continued collaboration on this important issue.

This letter is being filed electronically with your office pursuant to Section 1.1206 of the Commission’s rules.

Respectfully submitted,



W. Allen Gillum  
East Kentucky Network, LLC  
d/b/a Appalachian Wireless



Michael Prior  
Atlantic Tele-Network



Ron Smith  
Bluegrass Cellular

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<sup>1</sup> *Promoting Investment in the 3550-3700 MHz Band*, Draft Fact Sheet and Report and Order (rel. Oct. 2, 2018) (“Draft Order”).

<sup>2</sup> See *id.* ¶ 1.

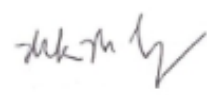
<sup>3</sup> See, e.g., *id.* ¶ 19.



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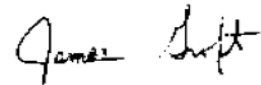
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Viaero

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West Central Wireless