



January 31, 2020

VIA ELECTRONIC FILING

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

Re: *Ex Parte* Presentation, GN Docket No. 18-122; GN Docket No. 17-258; ET Docket No. 18-295;
GN Docket No. 17-183; GN Docket No. 14-177; WT Docket No. 19-348; AU Docket No. 19-244

Dear Ms. Dortch:

On Thursday, January 30, 2020, CTIA President and CEO Meredith Attwell Baker and Scott Bergmann, Senior Vice President of Regulatory Affairs for CTIA, met with FCC Commissioner Geoffrey Starks and William Davenport, Chief of Staff and Senior Legal Advisor to Commissioner Starks, to discuss the Commission's critical role in making mid-band spectrum available in 2020.

2020 should be the "Year of Mid-Band" in the United States. The FCC should auction 350 megahertz of mid-band spectrum (70 megahertz of 3.5 GHz CBRS spectrum and 280 megahertz of 3.7-4.2 GHz spectrum or C-band) this year and embark on new initiatives to introduce additional licensed mid-band spectrum into the U.S. marketplace. As the Commission knows well, mid-band spectrum provides an ideal mix of coverage and capacity to advance 5G as a break-through enabler of innovation. But today, no mid-band spectrum is available for 5G in the United States.

Auctioning 350 megahertz of mid-band spectrum in 2020 will keep us competitive with where other nations are today. In the first six months of 2019, 30 of the 36 5G deployments launched in other nations relied on mid-band spectrum. And leading nations are on track to have four times as much licensed mid-band spectrum available as the U.S. by the end of 2020. Japan (800 megahertz), South Korea (280 megahertz), and China (360 megahertz) have each already assigned considerable mid-band spectrum to their national carriers.

Here in the United States, C-band is our top spectrum priority, and CTIA commended the decision to schedule a C-band order this month and targeting commencement of a public auction of 280 megahertz in 2020. C-band is the only large swath of mid-band spectrum in the pipeline, promising wider channelization for innovative 5G uses. We need to repurpose the band for new 5G services *as soon as possible*.



CTIA also applauded the Commission’s plan to auction 70 megahertz of 3.5 GHz CBRS spectrum in June 2020, as well as the Commission’s recent action enabling commercial operations across the U.S. While the band will incorporate unique challenges – a novel sharing arrangement and dramatically lower power levels – it affords an important near-term opportunity for innovation.

To compete in 5G, however, the United States will need to do more. Merely matching these countries’ investments will not be enough. These nations are not finished: Japan plans to auction another 200 megahertz for a total of 1000 megahertz of mid-band, South Korea will add another 320 megahertz by 2022, and China is looking for hundreds of megahertz more in mid-band. All told, 24 other nations are conducting mid-band auctions to fuel 5G deployments.

The 6 GHz band is a unique opportunity to enable new unlicensed *and* licensed services, and the Commission should take a balanced approach to the 1,200 megahertz in this band. It should issue a *Further Notice* on licensing the upper portion for 5G, and it can do so without delaying action on unlicensed in the lower portion of the band, subject to adoption of an effective interference protection and enforcement regime.

Finally, CTIA also encouraged the Commission to continue its focus on the 3100-3550 MHz band. CTIA supports the *Notice* proposing to remove the existing non-federal allocations in the 3300-3550 GHz band. NTIA’s recent assessment of the 3450-3550 MHz portion of the band is a first step in a process to enable wireless use in the band. As we move forward on the lower 3 GHz band, we need a framework that provides clear licensed rights and power levels at commercial mobile wireless levels. CTIA awaits the 3100-3550 MHz band report that NTIA will soon issue pursuant to the MOBILE NOW Act. We commit to working collaboratively with the Commission and other federal stakeholders to open this band to robust commercial mobile wireless use.

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The bands above are critical to enabling the United States to match the 5G spectrum investments of our global competitors. By moving quickly, the Commission can help maintain U.S. leadership in wireless and ensure that American consumers and the U.S. economy reap the benefits that 5G promises —job creation, economic growth, the promise of smart cities, and improvements in public safety, health care, our environment, and much, much more.



Pursuant to Section 1.1206 of the Commission's rules, this notice is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann

Senior Vice President, Regulatory Affairs

cc: Hon. Geoffrey Starks
William Davenport