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October 17, 2018

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 15th Street, SW

Washington, DC 20554

**Re:** *Promoting Investment in the 3550-3700 MHz Band,* ***GN Docket No. 17-258***.

Dear Ms. Dortch,

During an October 15, 2018, meeting with Rachel Bender with Chairman Pai’s office, Midcontinent Communications (Midco) discussed the importance of the 3.5 GHz band to providing high-speed and reliable fixed wireless broadband and to closing the Digital Divide in rural America.

Midco expressed its appreciation for the Commission’s Draft Order on many of the items contained in the Draft Order concerning Priority Access Licenses (PALs). While Midco agrees that the performance requirements for renewability of PALs are in the public interest, the point-to-multi-point performance requirement requires 50% population coverage for a county. This requirement will require an initial and substantial buildout to cover the vast areas and scattered populations in rural counties.

Rural flight will only compound the issue as rural fixed wireless providers could have to redesign their fixed wireless networks to continue meeting the performance requirements. All of this combines for a reduced return on investment for rural providers in purchasing PALs.

Midco, therefore, advocated that the Commission change the rural bidding credit qualifying criteria such that larger rural providers, like Midco, could take advantage of such credits in purchasing PALS. The specifics of those requested changes are included in Midco’s October 14, 2018, letter in the above-stated docket, and in the enclosed presentation that Midco shared during the meeting.

In accordance with Section 1.1206(b) of the Commission’s rules, I have filed a copy of this notice electronically in the above-referenced docket. Please address any questions regarding the foregoing to me.

Sincerely,

/s/ Nicole Tupman

Nicole Tupman

Corporate Counsel

Enclosure: Rural bidding credit presentation

cc: Rachel Bender