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October 17, 2017

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

Re: **GN Docket No. 17-258**
Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On October 16, 2017, Paul Margie representing Google Inc. and the undersigned representing the Wireless Internet Service Providers Association (“WISPA”) met with Louis Peraertz, Legal Advisor to Commissioner Mignon Clyburn, to discuss the draft Notice of Proposed Rulemaking in the above-referenced proceeding.¹

We pointed out that the draft NPRM would undo rules the Commission unanimously adopted just two years ago and explained that wireless Internet service providers (“WISPs”) and many others had invested and deployed commercial services and experimental trials in reliance on those rules. We noted that innovative equipment companies, including Cambium, Telrad, and Baicells, are competing vigorously in the market and that providers that have deployed their equipment in reliance on the FCC’s adopted rules are prepared to expand broadband rapidly into the CBRS band through software upgrades, without the need for additional hardware. The existing rules will accelerate fixed broadband deployment to rural areas, and support many different business models, including but not limited to those of national carriers. The rules proposed by the draft NPRM, however, would practically foreclose access to PALs by any company other than the few large mobile wireless carriers that operate over large geographic areas. We also provided Mr. Peraertz with the attached map, which shows more than 60 WISPs and other supporters of the Commission’s existing rules, representing communities across the country, filed comments with the Commission opposing CTIA’s and T-Mobile’s proposals.

¹ *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258, FCC-CIRC1710-04 (Oct. 3, 2017).



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We also discussed Professor Paul Milgrom's August 7, 2017 filing, which provided his recommendations on a way in which the FCC could structure the CBRS PAL auction to resolve concerns raised in the CTIA and T-Mobile petitions. As explained more fully in the filing, Professor Milgrom stated that CBRS auctions using the current rules' census-tract-sized licenses are practical and achievable by the Commission. Professor Milgrom noted that complementarity is weaker in the CBRS band, permitting a simpler auction, even with respect to license acquisition by national carriers.

We also pointed out that the draft NPRM does not faithfully reflect the existing record. A majority of commenters opposed the CTIA and T-Mobile proposals, and explained that these proposals would undermine flexible access to the band by a wider range of users, and reduce investment by all but the largest telecommunications carriers.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

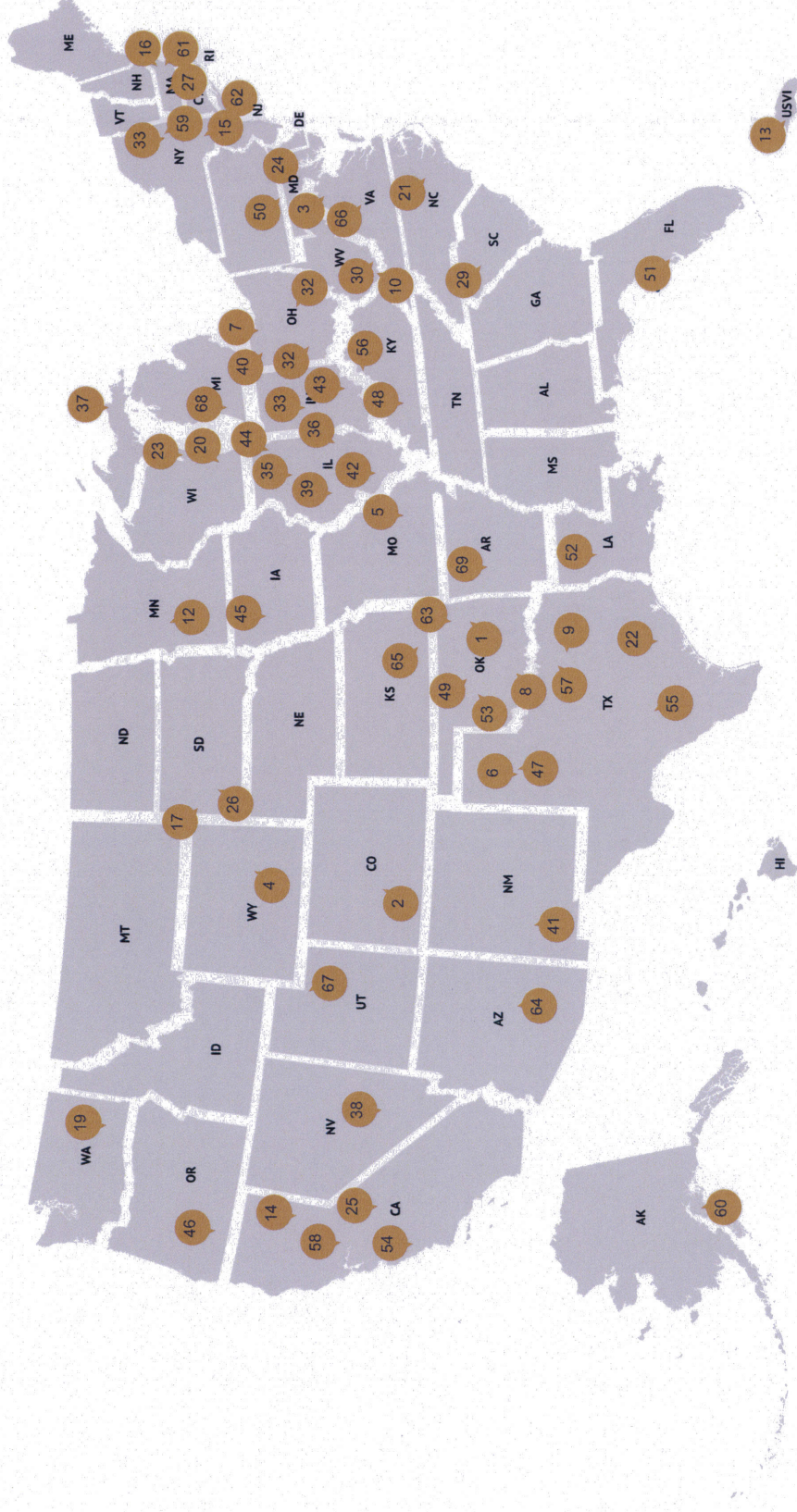
Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Enclosures

cc: Louis Peraertz
Paul Margie

Companies Across America Oppose CTIA's Radical Changes to the Innovation Band



1 AirLink Internet Services 2 AlignTec Incorporated 3 All Points Broadband 4 Alluretech 5 Alsat Wireless 6 Amarillo Wireless 7 Amplex Electric 8 Arbuckle Communications 9 Baicells Technologies 10 Bland County, Virginia 11 Bolt Internet 12 Broadband Corp 13 Broadband VI 14 Cal.net 15 Cantor Telecom Services 16 Casa Systems 17 Celerity Networks 18 Charter Communications 19 Columbia Energy 20 E-vergent.com 21 Eastern Carolina Broadband 22 EBTX Wireless 23 Excel.Net 24 Federated Wireless 25 Fire2Wire 26 Fourway Computer Products 27 General Electric 28 Gigabeam Networks 29 GlobalVision 30 Google 31 Hudson Valley Wireless 32 Imagine Networks 33 Intelligent Computing Solutions 34 Intellwave Broadband 35 Internet Communications 36 Joink 37 Lighthouse.Net 38 LTD Broadband 39 Medianet Wireless 40 MetaLINK Technologies 41 Mimbres Communications 42 Motorola 43 New Lisbon Broadband and Communications 44 New Wave Net Corp 45 Northwest Communications 46 PEAK Internet 47 Plains Internet 48 Portative Technologies 49 ProValue.Net 50 Quantum Internet and Phone 51 Rapid Systems 52 REACH4 Communications 53 RF Design Services 54 Ruckus Wireless 55 Rural Texas Broadband 56 Shelby Broadband 57 SmartBurst 58 Softcom Internet Communications 59 Sony 60 SpitwSpots 61 Starry 62 The City of New York 63 The Junction Internet 64 Tropic Networks 65 Valnet 66 Virginia Broadband 67 Vivint Wireless 68 West Michigan Wireless 69 Wireless etc