

February 20, 2018

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VIA ECFS

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

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84; Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258

Dear Ms. Dortch:

On February 15, 2018, Catherine Bohigian of Charter Communications, Inc. and Kathryn Zachem of Comcast Corporation met with Commissioner Carr and his chief of staff Jamie Susskind regarding the above-captioned proceedings. They explained that as emerging participants in the wireless broadband sector, Charter and Comcast support the objective of ensuring reasonable and timely access to public rights-of-way to enable the installation of small cell equipment. In today's converging communications marketplace, they noted that it is especially important for the Commission's policies to promote infrastructure deployment in a technology neutral manner that avoids preferences for any industry segment.

To that end, Ms. Bohigian and Ms. Zachem suggested that the Commission could meaningfully advance the goal of promoting 5G deployment without creating disparities by focusing its wireless broadband deployment efforts on streamlining access to public rights-of-way for the installation of small cell equipment, and deferring any action on associated wireline facilities, including backhaul, to a more comprehensive review of wireline infrastructure. They emphasized the Commission's recent conclusion that there is already a robust supply of fiber infrastructure and a competitive market capable of meeting backhaul needs.¹

Ms. Bohigian and Ms. Zachem also reiterated Charter's and Comcast's support for expanding the current PAL geographic license size in the 3.5 GHz Band from census tracts to counties. They pointed out that the variety in county size, population, and demographics will be advantageous for licensing purposes, because these types of variations enable opportunities both for providers who seek to serve smaller areas than PEAs and those who wish to serve larger areas than census tracts.

¹ See, e.g., *Business Data Services in an Internet Protocol Environment*, Report and Order, 32 FCC Rcd 3459, 3468 ¶ 16 (2017) (finding "almost no evidence of competitive problems in the supply of ... higher bandwidth services [above DS3 levels]" or for "transport services").

Ms. Marlene H. Dortch
February 20, 2018
Page 2

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Hon. Brendan Carr
Jamie Susskind