

February 21, 2020

VIA ECFS

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

Re: Notice of Ex Parte Presentation

GN Docket No. 18-122, *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*

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

RM-11791, *Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rule to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band*

RM-11778, *Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service*

Dear Ms. Dortch:

On February 21, 2020, the undersigned spoke with William Davenport, Chief of Staff and Senior Legal Advisor to Commissioner Starks, and Colleen King, also of Charter Communications Inc. ("Charter"), met with Umair Javed, Legal Advisor to Commissioner Rosenworcel, regarding the above-captioned proceedings.

During the meetings, Charter proposed that the Commission clarify the draft Order to minimize the potential for harmful interference at the band edge between terrestrial operations in the 3.7-3.98 GHz band ("C-Band") and Citizens Broadband Radio Service ("CBRS") operations. To this end, we suggested that the FCC require CBRS operators and C-Band licensees to coordinate and to synchronize time division duplexing operations above and below the 3.7 GHz band edge.¹ Relatedly, we asked that the Commission expand any technical stakeholder group that will address interference issues to include this synchronization issue and to include representatives of adjacent band operators and spectrum access systems. This is especially important because the wireless ecosystem for CBRS is now commercially viable. CBRS networks and devices that rely on spectrum licensed by rule were built through

¹ See Letter from Elizabeth Andrion, Charter Communications Inc., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (Feb. 6, 2020).

innovation and are currently being deployed, with enormous opportunity for flourishing growth in the coming months. In fact, by the time C-Band equipment and services are available, large CBRS innovations and deployments will already be in use.

Charter also emphasized the importance of confirming that satellite operators coordinate closely with earth station operators during the transition of the C-Band so that Charter, as an earth station operator, can adequately ensure continued quality and uninterrupted service to its nearly 16 million residential video customers and almost 500,000 small and medium business customers across the country, who rely on Charter's video services to receive their daily news, sports, and entertainment. Charter asked that the Commission require each space station operator to collaborate and consult with the affected earth station operators in developing their respective Transition Plans to ensure that the relevant earth stations are able to reasonably meet the transition milestones applicable to them.

To assist in reviewing and addressing any questions or disputes over the obligations that a Transition Plan imposes on earth station operators, Charter also proposed that the Commission delegate responsibility to the Wireless Telecommunications Bureau, in consultation with the International Bureau. Similarly, Charter suggested that the Commission clarify that the Relocation Coordinator's duties include mediating scheduling disputes between earth station operators and space station operators. These adjustments are in line with the Commission's long-recognized need to minimize disruption to incumbent operations during spectrum transitions.²

Respectfully submitted,

/s/ Elizabeth Andrion

Elizabeth Andrion
Senior Vice President
Regulatory Affairs

cc: Meeting attendees

² See, e.g., *In re Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems*, Ninth Report and Order and Order, 21 FCC Rcd 4473, 4479-80 ¶ 11 (2006) (explaining that in prior relocation schemes, the Commission "has found that the *Emerging Technologies* relocation policies best balance the interest of new licensees seeking early entry into their respective bands in order to deploy new technologies and services with the need to *minimize disruption to incumbent operations used to provide service to customers during the transition*") (emphasis added).