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February 22, 2018

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

Re: **Wireless Internet Service Providers Association
GN Docket No. 17-258
Notice of Oral Ex Parte Presentations**

Dear Ms. Dortch:

On February 20, 2018, on behalf of the Wireless Internet Service Providers Association (“WISPA”), Jimmy Carr, CEO of All Points Broadband and a member of WISPA’s Board of Directors (Legislative Committee Chair) and undersigned counsel to WISPA, met separately with (1) Rachael Bender, legal advisor to Chairman Ajit Pai, and (2) Commissioner Michael O’Rielly and his legal advisor Erin McGrath to discuss issues related to the above-referenced proceeding.¹

In each meeting, the WISPA representatives provided an update on WISPA’s ongoing discussions with other significant stakeholders concerning the geographic size, license term and renewability of Priority Access Licenses (“PALs”). We made clear that substantial progress on an industry-based solution had been made and that WISPA’s efforts to reach a broader agreement among stakeholders would be continuing. Consistent with those discussions, the WISPA representatives made clear that PALs in rural areas should be assigned by census tract, and that non-rural areas could include a mix of geographic sizes including census tracts. We further explained that we were developing a definition of “rural area” based on population density that held promise for broader agreement. The WISPA representatives indicated that stakeholders also had productively discussed PAL terms and renewability.

¹ *Promoting Investment in the 3550-3700 MHz Band; Petitions for Rulemaking Regarding the citizens Broadband Radio Service*, GN Docket No. 17-258, RM-11788 (Terminated) and RM-11789 (Terminated), FCC 17-134 (Oct. 24, 2017).



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We made clear that WISPA remains interested in coordinating in the near term with other stakeholders to see if industry interests could reach common understandings on all or some of the outstanding issues.

This letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Commissioner Michael O’Rielly
Erin McGrath
Rachael Bender