



February 26, 2018

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258; Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 17-183.

Dear Ms. Dortch,

On February 23, 2018, Kara Romagnino Graves and Jen Oberhausen of CTIA, along with CTIA members Stacey Black of AT&T, Gardner Foster of Sprint, John Hunter of T-Mobile, and Patrick Welsh of Verizon, met with Rachael Bender of the office of Chairman Ajit Pai, to discuss the above-captioned proceedings.

During the meeting, CTIA expressed its support for the Commission moving forward to adopt the targeted changes to the 3.5 GHz band rules proposed in the Notice of Proposed Rulemaking ("Notice") to promote investment in the band.¹ CTIA emphasized the importance of the 3.5 GHz Citizen's Broadband Radio Service ("CBRS") band to the wireless industry and the band's growing importance in the global 5G landscape.² CTIA also explained that the targeted proposals in the Notice were designed to maximize investment in this spectrum without undermining the novel three-tier spectrum framework that the Commission designed to encourage innovation in the band.

¹ See *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking, 32 FCC Rcd 8071 (2017).

² See Comments of CTIA, GN Docket No. 17-258, at 2-3 (filed Dec. 28, 2017) ("CTIA Comments"); see also, e.g., Doug Irwin, Korean Telecom to Use 5G at PyeongChang Winter Olympics, Radio Mag Online (Feb. 6, 2018), <https://www.radiomagonline.com/trends/korean-telecom-to-use-5g-at-pyeongchang-winter-olympics> (noting 5G deployment plans in the 3.5 GHz and 28 GHz bands).



In particular, and consistent with its filings in this proceeding,³ CTIA urged the Commission to move forward quickly to modify the Priority Access License (“PALs”) terms to a standard, ten-year term with an expectation of renewal—which would give licensees greater certainty and encourage investment—and expand the PAL license area in order to reduce auction complexity, interference concerns, and administrative burdens on the Commission, licensees, and Spectrum Access System Administrators. As former FCC Chief Economist Michelle Connolly found, shorter license terms, a lack of renewability, and smaller geographic license areas would severely diminish the value of the PAL relative to a standard 10-year license term and geographic areas above the census tract area.⁴ Indeed, as former FCC Commissioner Harold Furchtgott-Roth found, shorter license terms, absence of a presumption of renewability, and small geographic areas are among the factors likely to diminish the market value of PALs by 50 to 95 percent relative to the value of similar licensed spectrum.⁵

CTIA also urged the Commission to facilitate wider bandwidth operations by adopting the out-of-channel emissions limit proposed by Qualcomm.⁶ Finally, consistent with our comments, we asked the Commission to take additional steps to enhance the PAL framework, including eliminating the rules making one fewer PAL available than sought by potential bidders, preventing PAL assignments in a market if only one applicant qualifies to bid, and requiring public disclosure of Citizens Broadband Radio Service Device (“CBSD”) registration information.

Making these targeted reforms to the CBRS framework will help unlock the benefits that 5G will bring to the U.S. economy—benefits that were not foreseen when this proceeding was originally undertaken—by providing faster speeds and additional

³ See generally CTIA Comments; Reply Comments of CTIA, GN Docket No. 17-258 (filed Jan. 29, 2018) (“CTIA Reply Comments”).

⁴ See Michelle Connolly, Ph.D., *Impact of Proposed Changes to Improve Investment in the 3550-3700 MHz Band* (Jan. 29, 2018), attached to CTIA Reply Comments.

⁵ See, e.g., CTIA Comments at 4-5 (citing Harold Furchtgott-Roth, *The Potential Market Value and Consumer Surplus Value of The Citizens Broadband Radio Service (CBRS) at 3550-3700 in the United States*, at B-1-2 (Nov. 2017), <https://www.cbrsalliance.org/whitepapers>).

⁶ See CTIA Reply Comments at 20-22.



bandwidth needed to support the Internet of Things.⁷ Importantly, CTIA noted that the Commission can move forward with these proposals without delaying access to the 3.5 GHz band or undermining General Authorized Access ("GAA") use. Instead, these targeted changes would improve the novel three-tier framework by increasing incentives for investment in PALs and the band as a whole, without affecting GAA access to the CBRS band or changing the flexible nature of the CBRS framework.

Also during the meeting, CTIA commended the Commission for launching the Mid-Band Notice of Inquiry examining new opportunities for wireless services between 3.7 and 24 GHz and encouraged the Commission to make additional mid-band spectrum available for mobile broadband.⁸

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission participant. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Kara Romagnino Graves

Kara Romagnino Graves
Director, Regulatory Affairs

cc: Rachael Bender

⁷ See *Smart Cities: How 5G Can Help Municipalities Become Vibrant Smart Cities*, Accenture Strategy (Jan. 2017), <https://www.ctia.org/docs/default-source/default-document-library/how-5g-can-help-municipalities-become-vibrant-smart-cities-accenture.pdf>; see also *Wireless Connectivity Fuels Industry Growth and Innovation in Energy, Health, Public Safety, and Transportation*, Deloitte and CTIA (Jan. 2017), http://www.ctia.org/docs/default-source/default-document-library/deloitte_20170119.pdf.

⁸ See *Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz*, Notice of Inquiry, 32 FCC Rcd 6373 (2017).