

Patrick Welsh
Assistant Vice President
Federal Regulatory Affairs



February 27, 2018

Ex Parte

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

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

Dear Ms. Dortch:

On February 23, Tamara Preiss of Verizon and I met with Rachael Bender, Chairman Pai's legal advisor, on the above-referenced proceeding.

During the meeting, we expressed support for targeted changes to the licensing regime for Priority Access Licenses ("PALs"). First, we described how license renewability and longer license terms would promote long-term investment in the 3550-3700 MHz band. Second, we urged the FCC to adopt larger geographic areas for PALs. While we recognized that there is no optimal geographic size for all bidders, we explained that it is generally easier to disaggregate down in a secondary market than to aggregate up to a desired size at auction. We noted that as long as licenses can be partitioned and disaggregated post-auction, deviations from optimal license size at auction can be readily corrected in the secondary market.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Welsh", with a stylized flourish at the end.

cc: (via email)
Rachael Bender