

February 28, 2019

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*
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 26, 2019, Elizabeth Andrion and Colleen King of Charter Communications, Inc. ("Charter") met with Erin McGrath of Commissioner O'Rielly's office regarding the above-captioned matters. On February 27, 2019, Ms. Andrion and Ms. King, accompanied by Howard Symons of Jenner & Block LLP, met with Joyce Jones, Matthew Pearl, Thomas Derenge, Becky Schwartz, Peter Daronco, Brian Wondrack, Paul Powell, Blaise Scinto, and Jeff Tignor of the Wireless Telecommunications Bureau, and Paul Lafontaine of the Office of Economics and Analytics, regarding these matters. Also on February 27, 2019, Ms. Andrion met with William Davenport of Commissioner Starks's office regarding these matters. On February 28, 2019, Ms. Andrion and Ms. King met with Will Adams of Commissioner Carr's office regarding these matters.

At the meetings, the Charter representatives summarized Charter's proposal for the Commission to exercise its clear statutory authority to determine the appropriate portion of the C-Band to reallocate for terrestrial use and then award the resulting terrestrial licenses through a system of competitive bidding that satisfies the requirements of the Communications Act.¹ The Charter representatives explained that this approach would ensure this important spectrum

¹ See Letter from Elizabeth Andrion, Charter, and Howard J. Symons, Jenner & Block LLP to Marlene H. Dortch, FCC, GN Docket No. 18-122 (filed Feb. 22, 2019).

resource is made available for 5G use in the quickest, fairest, most efficient way possible. The Charter representatives also explained how the relocation reimbursement and reserve charge aspects of the proposal were supported by past Commission practice;² outlined the litigation risks presented by the proposal advanced by the C-Band Alliance;³ and explained why the recent Commission decisions put forward by the C-Band Alliance in support of its proposal do not in fact offer any precedent for that proposal.⁴

Please direct any questions regarding the foregoing to the undersigned.

Respectfully submitted,

/s/ Elizabeth Andrion

Elizabeth Andrion
Senior Vice President
Regulatory Affairs

cc: Erin McGrath
Joyce Jones
Matthew Pearl
Thomas Derenge
Becky Schwartz
Peter Daronco
Brian Wondrack
Paul Powell
Blaise Scinto
Jeff Tignor
Paul Lafontaine
William Davenport
Will Adams

² See *id.* at 5-6.

³ See *id.* at 7-13.

⁴ See *id.* at 13-16.