



WASHINGTON, DC

STEPHEN E. CORAN
202.416.6744
SCORAN@LERMANSENTER.COM

March 8, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Partitioning, Disaggregation, and Leasing of Spectrum*
WT Docket No. 19-38

Notice of Oral Ex Parte Communication

Dear Ms. Dortch:

On March 7, 2019, Claude Aiken, President and CEO of the Wireless Internet Service Providers Association (“WISPA”), and the undersigned met with Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly, to discuss matters related to the above-referenced proceeding.

The WISPA representatives asked that the Commission seek comment in the upcoming Notice of Proposed Rulemaking on whether the benefits intended by the proposed rules should be extended to rural broadband providers that are not “carriers” as defined in Section 616 of MOBILE NOW Act.¹ We explained that strictly limiting the benefits and build-out incentives to “carriers” would exclude broadband providers that are not “common carriers” and provide fewer options for larger carriers wishing to disaggregate, partition, or lease spectrum to rural providers.

¹ *Partitioning, Disaggregation, and Leasing of Spectrum*, Notice of Proposed Rulemaking, WT Docket No. 19-38, FCC-CIRC1903-06 (Feb. 22, 2019).



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March 8, 2019

Page 2

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in each of the above-referenced docket. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Erin McGrath
Claude Aiken