



**FILED VIA ECFS**

March 9, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20510

Brian Hendricks  
Government Relations  
Nokia

Address:  
1100 New York Avenue, NW  
Suite 705 West  
Washington, DC 20005

Email:  
brian.hendricks@nokia.com

Re: *Notice of Ex Parte Presentation*, GN Docket Nos. 14-177, 15-319, 17-183, 17-258; IB Docket Nos. 97-95, 15-256; WT Docket Nos. 10-112, 17-79

Dear Ms. Dortch:

On March 7, 2018, Brian Hendricks and Jeffrey Marks of Nokia met with Nicholas Degani, Senior Counsel to Chairman Ajit Pai, and Rachael Bender, Wireless and International Advisor to the Chairman. The attached policy paper served as the basis for our discussion.

Nokia asked that the Commission establish a timeline for auctioning mid-band and mmWave spectrum bands through at least the next two years to add certainty for future 5G builds. Within that timeline, Nokia stressed the urgency of the United States moving to make spectrum available for 5G deployment in the 3.5 GHz band, 3.7-4.2 GHz band and mmWave bands. While the Nokia representatives commended the Commission for priming the spectrum pipeline by conducting proceedings and issuing service rules for new spectrum bands, we noted that the Commission is not moving quickly enough and should expedite auctioning those bands.

Nokia discussed the need for the Commission to develop a more robust record in the proceeding related to the 3.7-4.2 GHz band, ultimately providing additional proposals for the most expeditious way to clear that band for terrestrial 5G services. With U.S. global competitiveness at stake, we must drive aggressively toward 5G deployment. Nokia indicated that the proposal of Intel/Intelsat to unlock a limited amount of spectrum at Intelsat's discretion is not sufficient to meet the needs of wireless operators, or to keep the U.S. competitive with the emerging 5G plans in China and other parts of Asia. Therefore, Nokia is studying additional options to present to the Commission.

With respect to the 3.5 GHz band, Nokia urged the Commission to complete the current proceeding, in which it is considering important changes to the rules, as quickly as possible. Nokia also asked that the Commission expedite processing and approving proposals for spectrum access

system (SAS) administrators, including Nokia's own SAS submission. Especially since no auction is required for General Authorized Access operations, 3.5 GHz could be a possible first-mover in new mid-band spectrum to come online. With respect to Priority Access Licenses (PALs), the Commission should not delay the development of auction rules, and the auction for PALs until after auctions for the mmWave bands as appears to be the Commission's direction. Rather the Commission should lay the groundwork for the auction of multiple bands simultaneously, so that 3.5 GHz auctions do not slip into 2020.

Nokia further discussed the need for infrastructure siting reform. Nokia believes that collaboration, rather than litigation, is the best path forward for connecting our communities. While we recognize the legitimate interests that states and localities have in infrastructure siting, we also advocate that there be a regulatory backstop for parties to seek recourse at the Commission when the system breaks down.

Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

*/s/ Brian Hendricks*

Brian Hendricks

cc: Nicholas Degani  
Rachael Bender