Mary N. O’Connor

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March 11, 2019

Marlene H. Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, SW

Washington, DC 20554

Re: *ORAL EX PARTE PRESENTATION – Transforming the 2.5 GHz Band WT Docket No. 18-120*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(1) of the Commission’s Rules to notify the Commission that on Friday, March 8, 2019, the undersigned counsel for the Wireless Communications Association International (“WCA”) met with William Davenport, Chief of Staff and Senior Legal Advisor to Commissioner Geoffrey Starks.

During the course of the meeting, we reiterated the advocacy positions WCA has advanced in its comments and reply comments in this proceeding. In particular, we emphasized that WCA’s proposal for rationalizing Educational Broadband Service (“EBS”) Geographic Service Areas to county boundaries without regard to the extent of the current overlap (1) is a practical solution that is consistent with the limitations of the Commission’s Universal Licensing System, (2) has been endorsed by the smaller operators represented by WCA and by the Wireless Internet Service Providers Association, (3) eliminates the small, oddly shaped unserviceable slivers that would remain under other proposals, and (4) permits auctioning of the EBS white space without the lengthy delay that would be necessary to identify auctionable spectrum under other proposals. We also reiterated WCA’s arguments against the use of an incentive auction regime for licensing EBS white space, stressing that such an auction will be of limited impact because the provisions of current leases effectively preclude the vast majority of EBS licensees from participating in any incentive auction. Finally, we noted that while some of those arguing in support of a local priority window have done meritorious things with their EBS spectrum, the overwhelming majority of EBS licensees have leased the maximum possible capacity on their systems, and make minimal use of their access to the spectrum. Thus, we noted, the public interest in expanding broadband availability will be enhanced by proceeding directly to an auction of the available EBS spectrum, rather than proceeding with a local EBS priority window.

Pursuant to Sections 1.1206(b)(1) and 1.49(f) of the Commission’s Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,

     /s/   *Mary N. O’Connor*

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Paul J. Sinderbrand

Counsel to the Wireless Communications Association International

cc: William Davenport