

March 11, 2019

**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, IB Docket No. 16-185

Dear Ms. Dortch:

On March 7, 2019, Patricia Paoletta of Harris, Wiltshire & Grannis LLP and the undersigned met with Rachael Bender, Wireless and International Advisor to Chairman Pai. The meeting focused on Facebook's priorities for the World Radiocommunication Conference (WRC-19), including for the upcoming regional preparatory meeting at the Organization of American States' Committee on International Telecommunications, CITEL PCC.II.

As Facebook explained, its mission is to give people the power to build community and bring the world closer together. Toward that end, Facebook is pioneering new technologies that can bring affordable connectivity to more people faster. Critically, Facebook is neither a service provider nor a manufacturer, and thus is agnostic with respect to the technologies that ultimately are used to facilitate such connectivity. Facebook's objective is to promote spectrum policies that allow service providers to leverage a variety of technologies to advance connectivity worldwide. Facebook's priorities for WRC-19 and CITEL preparations reflect this objective.

With respect to Agenda Item 1.13, on identifying spectrum for mobile broadband, Facebook expressed its support for the current U.S. Proposal to CITEL for No Change to the 66-71 GHz band. Facebook observed that the Commission's existing rules for unlicensed access in the 60 GHz band have promoted an ecosystem that has facilitated affordable connectivity in developing countries. By preserving the *status quo* of the 66-71 GHz band, the U.S. would ensure that this ecosystem for affordable access is not jeopardized.

With respect to Agenda Item 1.14, Facebook stated its hope that the U.S. would join at the upcoming PCC.II meeting the Draft Inter-American Proposals (DIAPs) identifying spectrum for High-Altitude Platforms Stations. Joining those DIAPs at this upcoming meeting would remove one Agenda Item from the list of unresolved items and allow the U.S. to focus its energies on issues that have less regional consensus in the run-up to what will be a complex Final Meeting of CITEL PCC.II in August.



Finally, Facebook noted that it would not favor any Future Agenda Item on identifying the 6 GHz band for local area networks, to the extent it might be proposed by another administration. Facebook has supported the Commission's proposed repurposing of much of the 6 GHz band for unlicensed broadband access. While possible proposals for Future Agenda Items on 6 GHz from other administrations may seek a comparable outcome, history has shown that bringing a proposed repurposing of a band to the International Telecommunication Union for study has often resulted in global operational rules that are far more restrictive than that which U.S. broadband consumers enjoy domestically.

Sincerely,

/s/

Jarrett S. Taubman  
Public Policy Manager, Connectivity &  
Access  
Facebook, Inc.

Cc: Rachael Bender  
Thomas Sullivan  
Michael Mullinix