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March 14, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Communication in *Transforming the 2.5 GHz Band, WT Docket No. 18-120*; and *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 18-122*

Dear Ms. Dortch:

On March 11, 2019, Justin TerWee, the lead fixed wireless engineer for Midcontinent Communications (Midco), and I met with Will Adams from Commissioner Carr's office. Midco discussed the above-referenced proceedings, and our Midco Edge OutSM strategy where we "edge out" our high-speed broadband from our fiber using fixed wireless in the most rural areas of our footprint.

We shared our views on the 2.5 GHz band as summarized in the enclosed presentation and accompanying binder of maps on rationalization of incumbent licensees. We highlighted our desire to use the 2.5 GHz band to help close the Digital Divide. Specifically, 40 MHz of the potentially 195 MHz available would allow us to offer speeds of over 230/25 Mbps about 4 miles away from the vertical asset for near line-of-sight customers, 100/20 Mbps about 8 miles from the vertical asset for near-line-of-sight customers, and areas all the way up to 18 miles away where we could still offer 25/3 Mbps, low latency service. We requested, therefore, that the Commission institute rules to allow Midco and other fixed wireless providers to have access to the spectrum and eliminate the commercial middlemen under the current licensing scheme. Specifically, we asked that current incumbent licenses be rationalized to maximize the white space available for auction; that no local priority filing windows be used; and a limit be placed on spectrum available for purchase, such as the channel plan and spectrum limit of 63 MHz as proposed by the Wireless Internet Service Providers Association (WISPA). *See* WISPA Comments, WT Docket No. 18-120, at p. 20; WISPA Reply Comments, WT Docket No. 18-120, at p. 18.

We also shared our views on the C-Band. We are a cable operator with incumbent C-Band licenses used for providing video services, and would like the Commission to institute appropriate safeguards to protect us and other incumbents in the C-Band. After protecting incumbents, however, we would like the Commission, not a private party, to auction the remaining C-Band spectrum. As with other mid-band spectrum, the C-Band holds great promise in assisting Midco and other fixed wireless providers in closing the Digital Divide. We shared, therefore, our opposition to a privately-led auction.

In accordance with Section 1.1206(b) of the Commission's rules, I have filed a copy of this notice electronically in the above-referenced docket. Please address any questions regarding the foregoing to me.

Sincerely,

/s/ Nicole Tupman

Nicole Tupman
Assistant General Counsel
Midcontinent Communications

Enclosures

EBS & Rural Broadband

March 2019

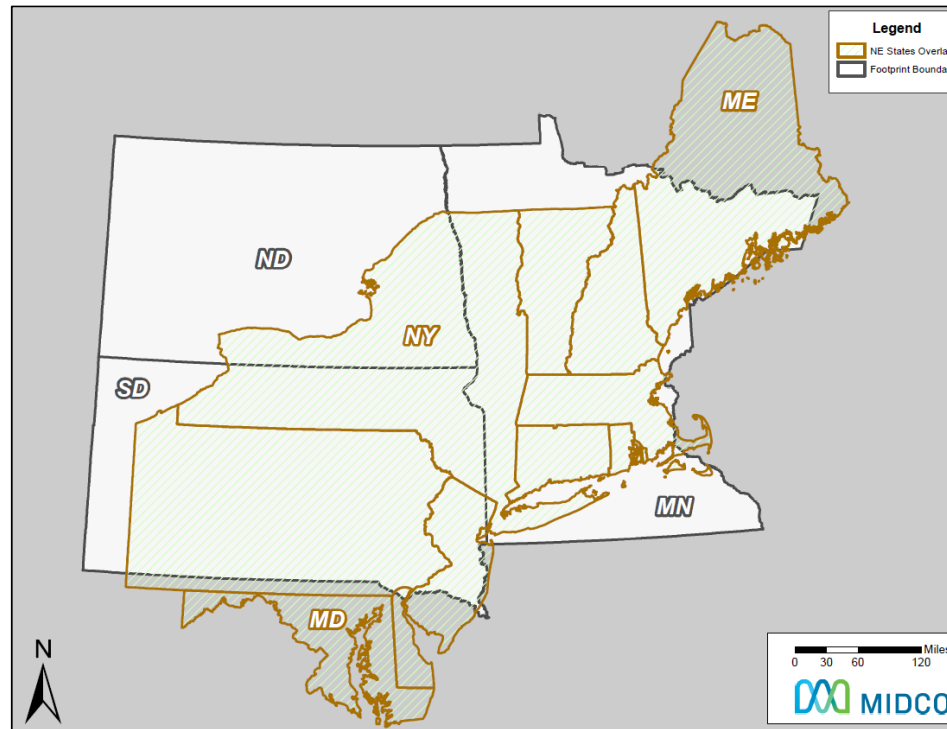


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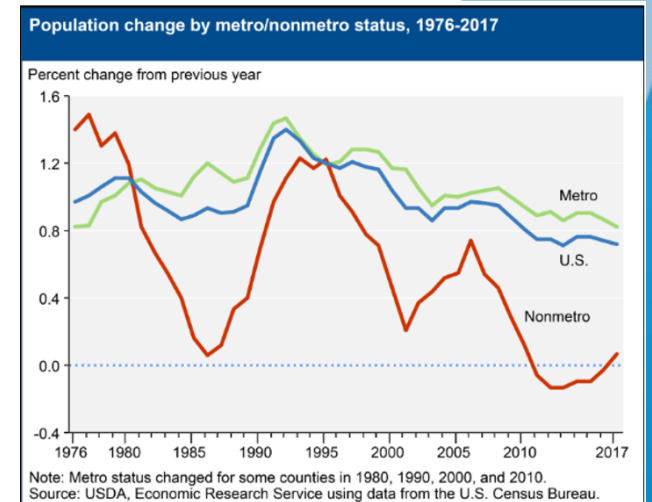
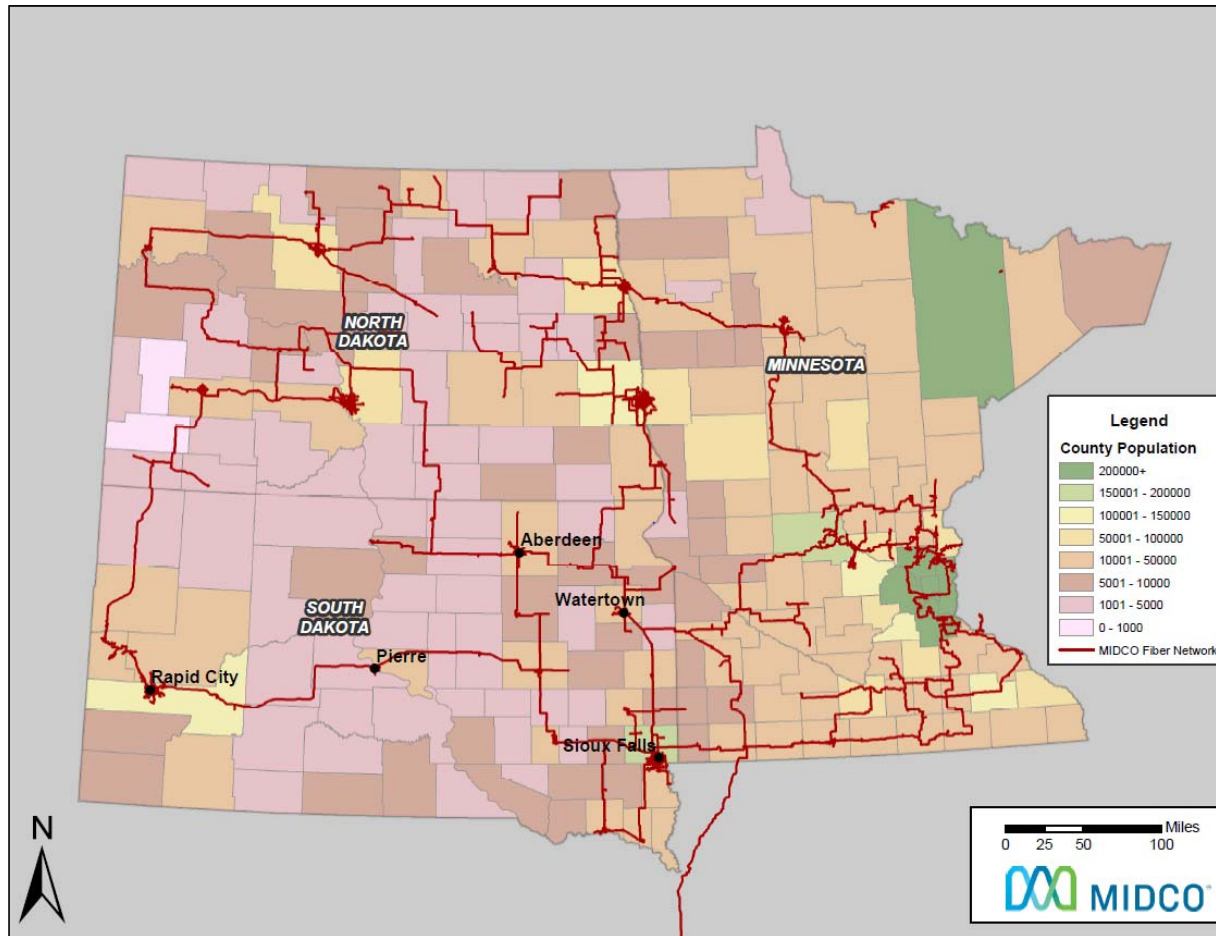


Rural Broadband

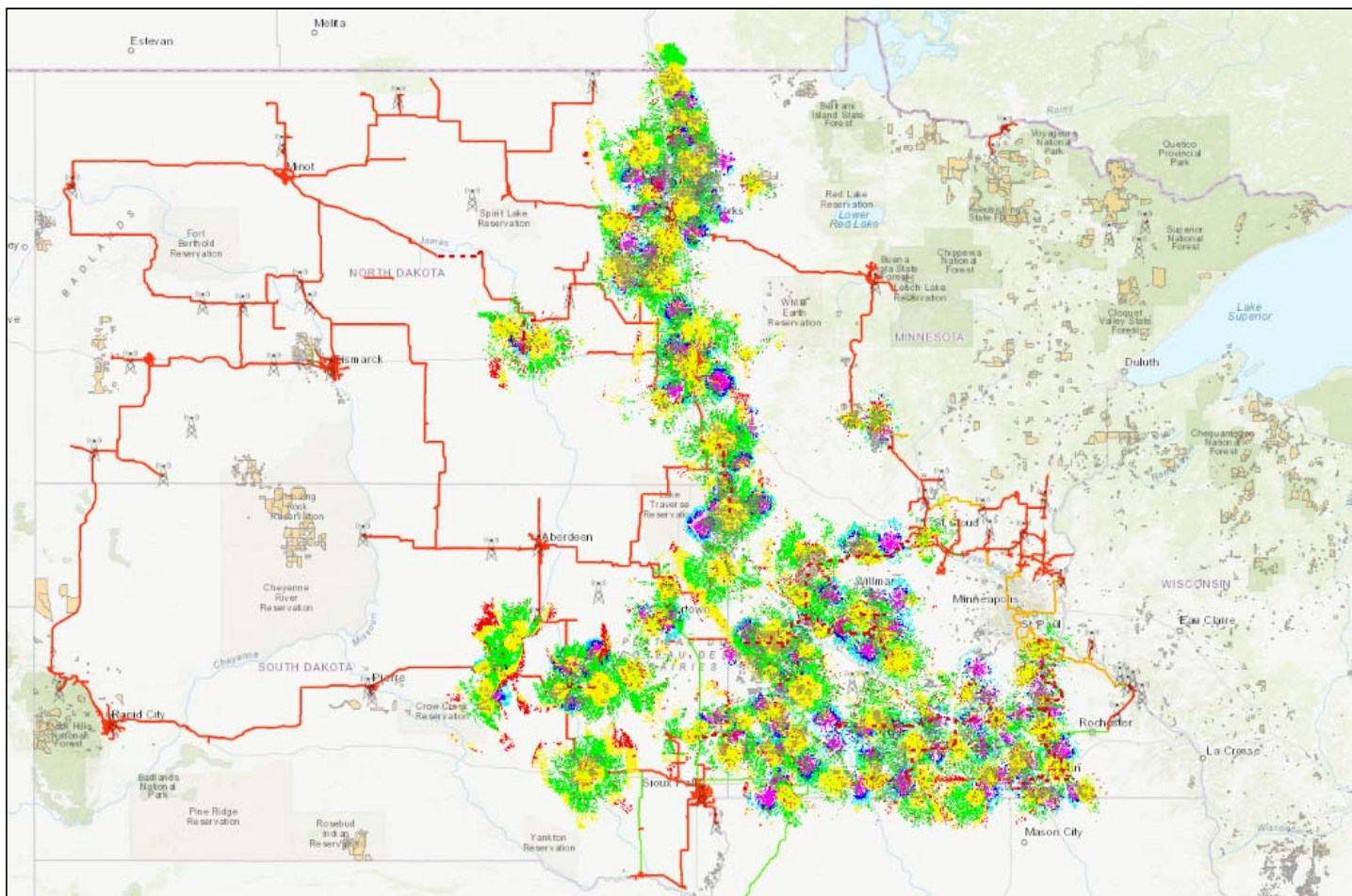
- Northeast population: approx. 61.2 million
- Midco footprint population: approx. 7.2 million



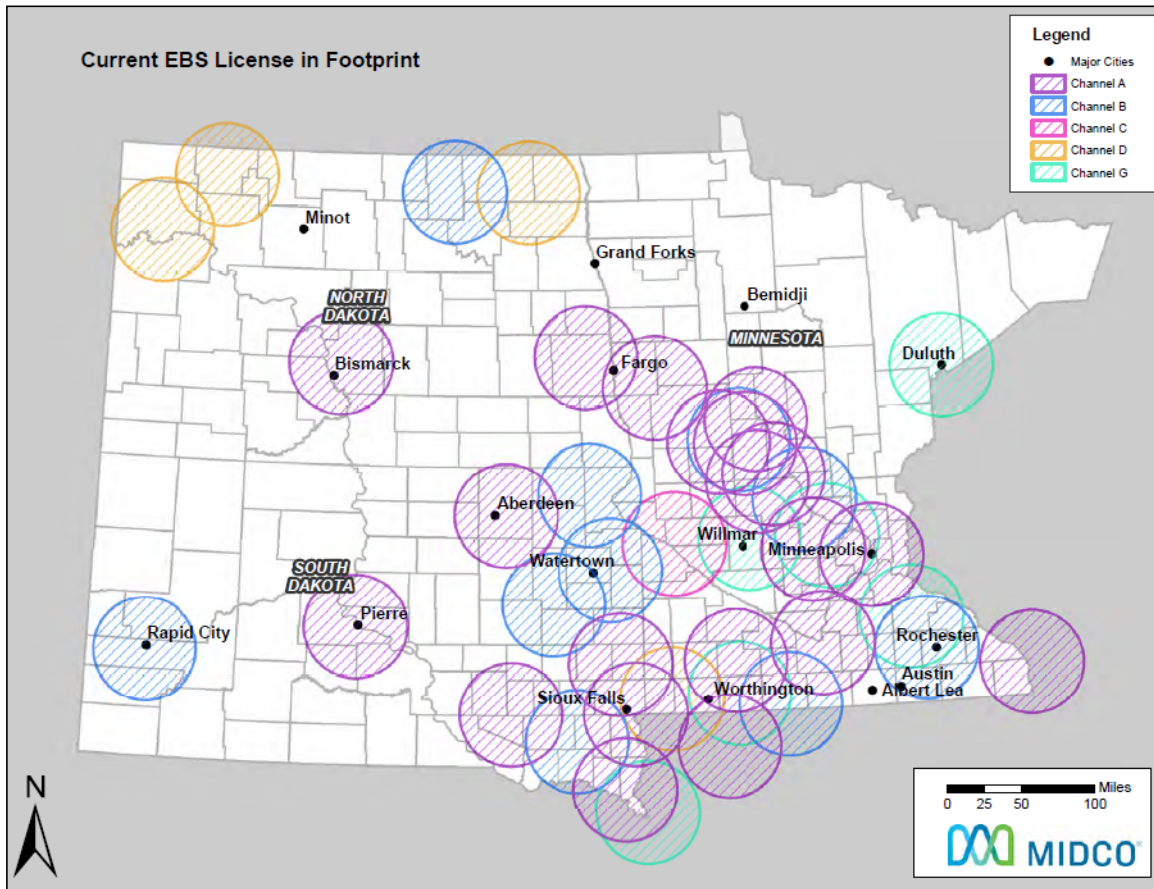
Low Density and Rural Flight



Midco Edge OutSM to Serve Rural America

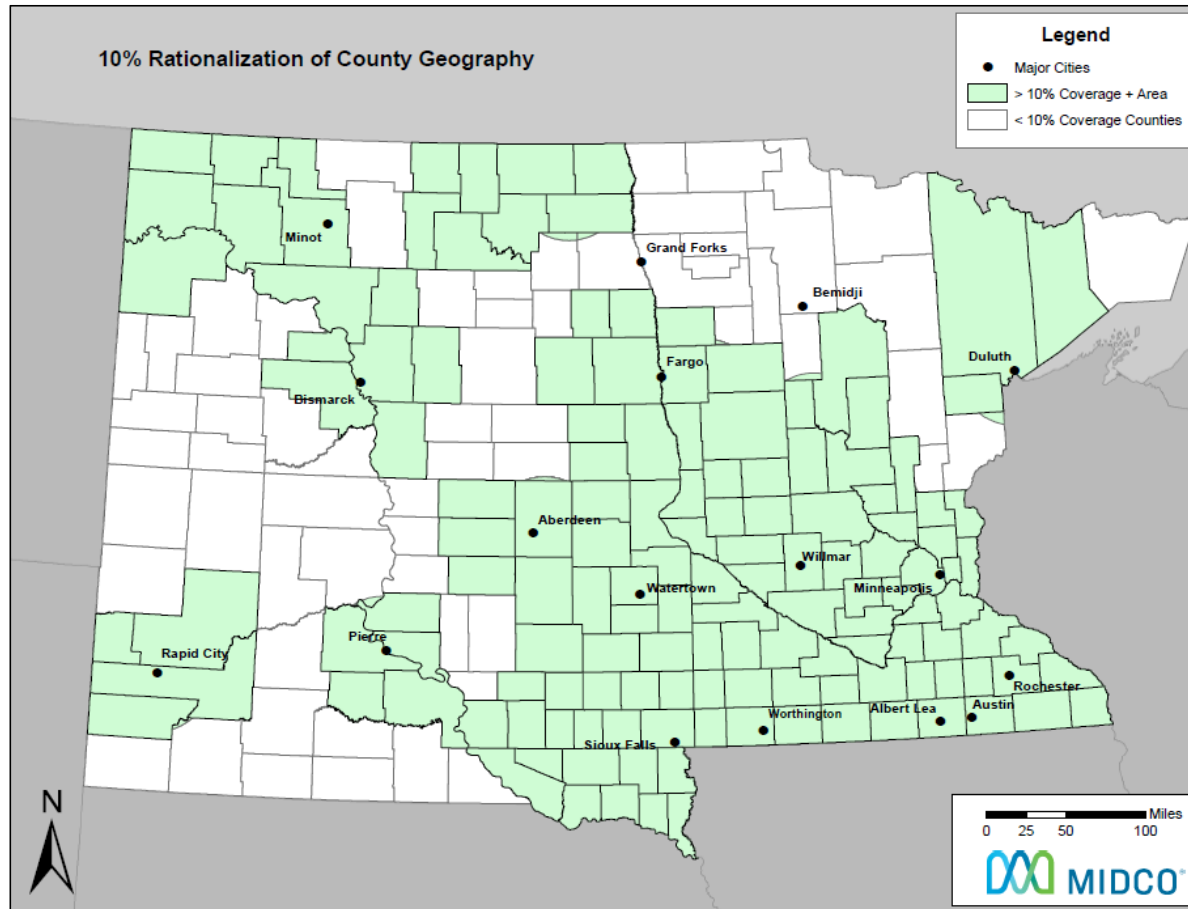


EBS White Space



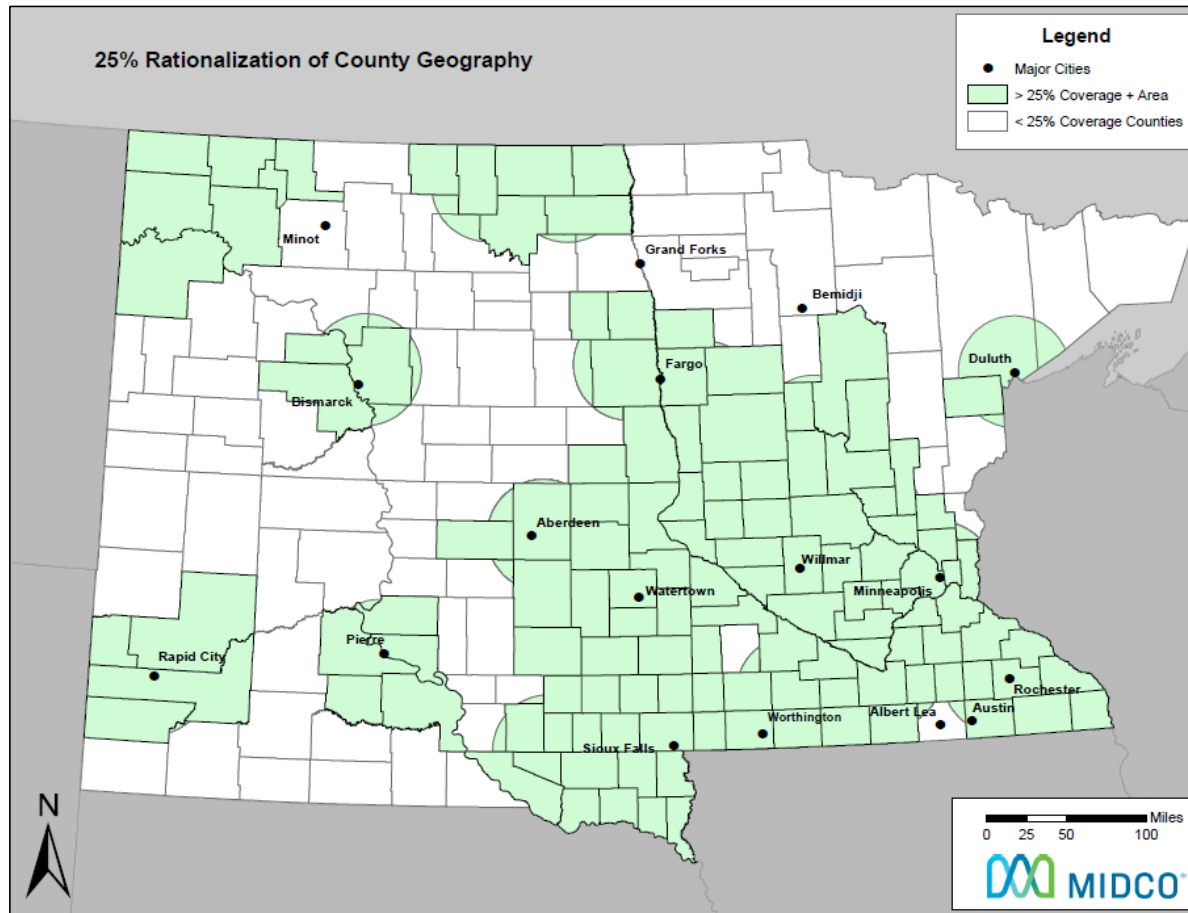
- 98% of licenses are commercial
- 61.2% of tristate area has EBS white space

10% Rationalization



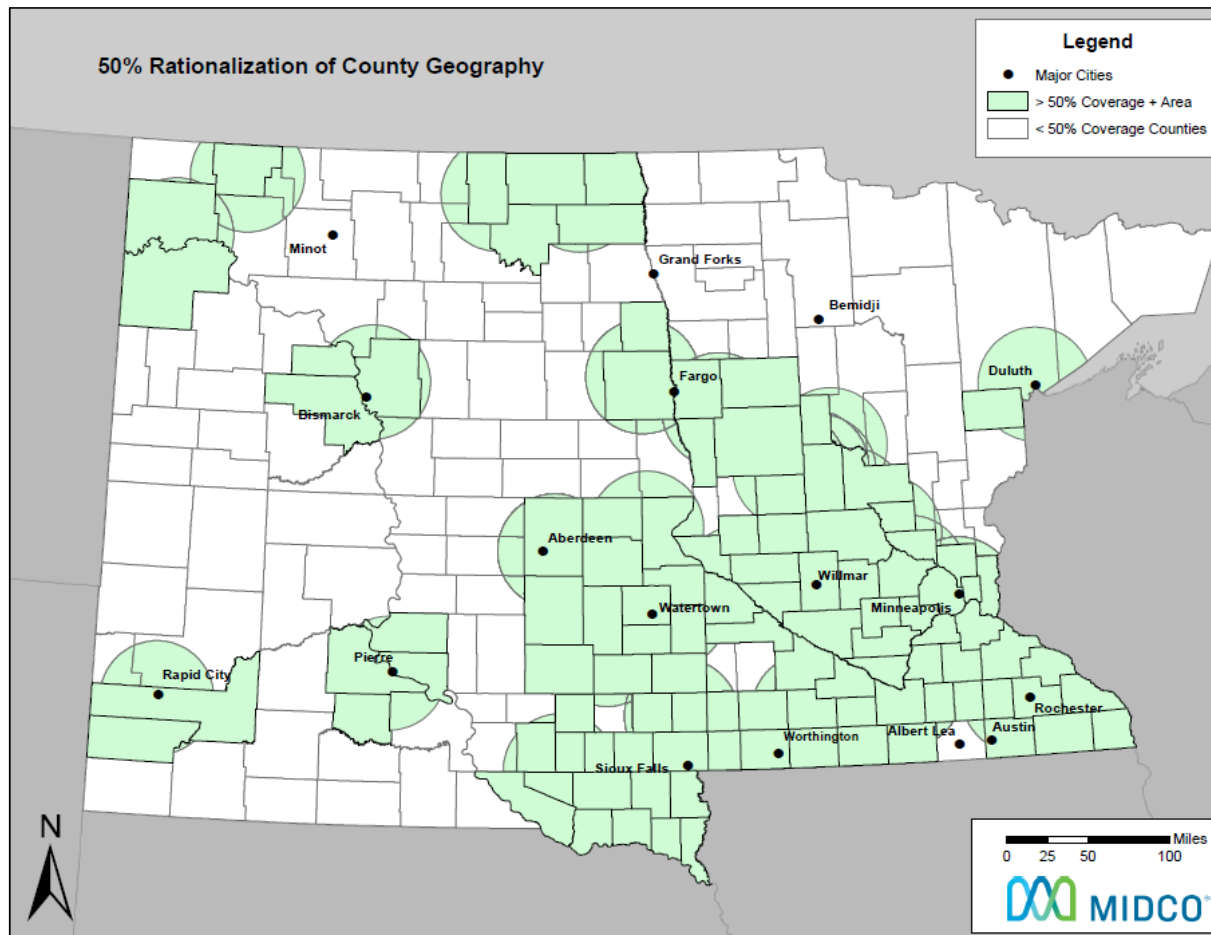
- Decrease white space in status quo by approximately 21%

25% Rationalization



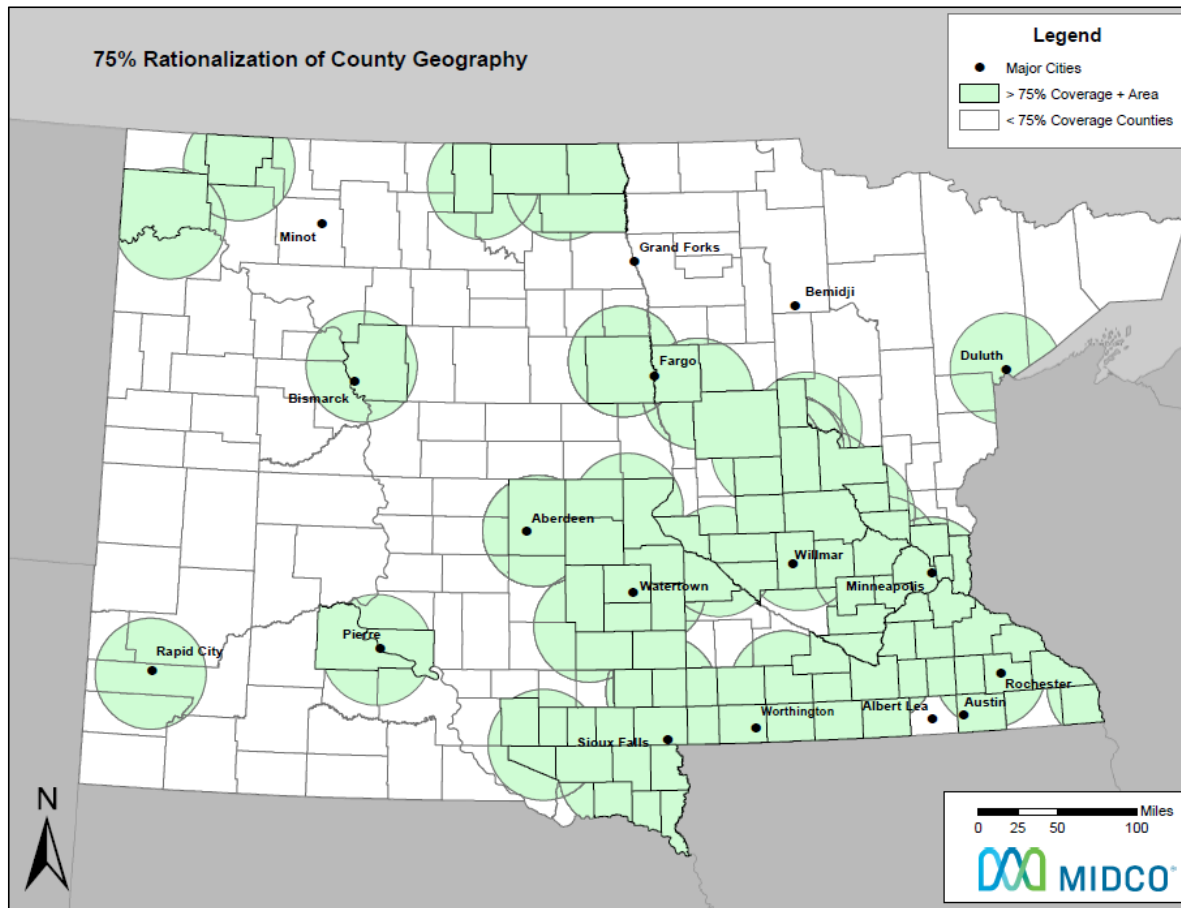
- Decrease white space in status quo by approximately 13%

50% Rationalization



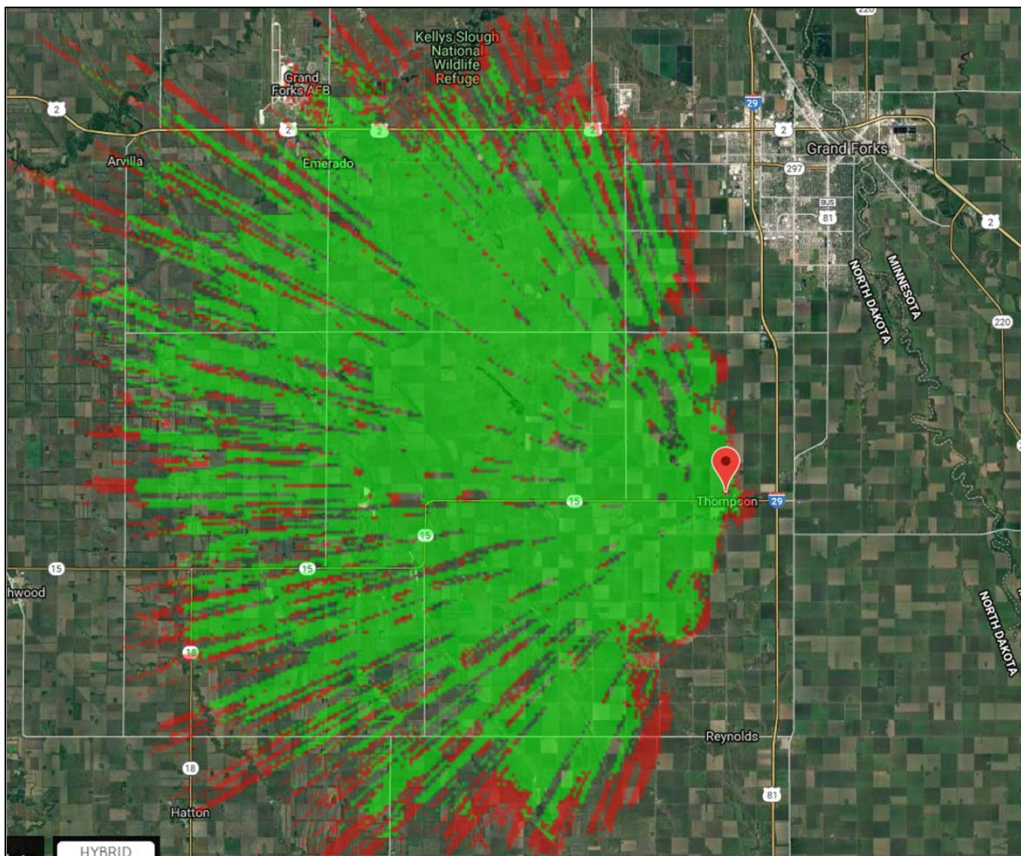
- Significant *gains* still for some incumbents for *free*
- Ex – Rapid City, SD
- Ex – Bismarck, ND

75% or 80% Rationalization



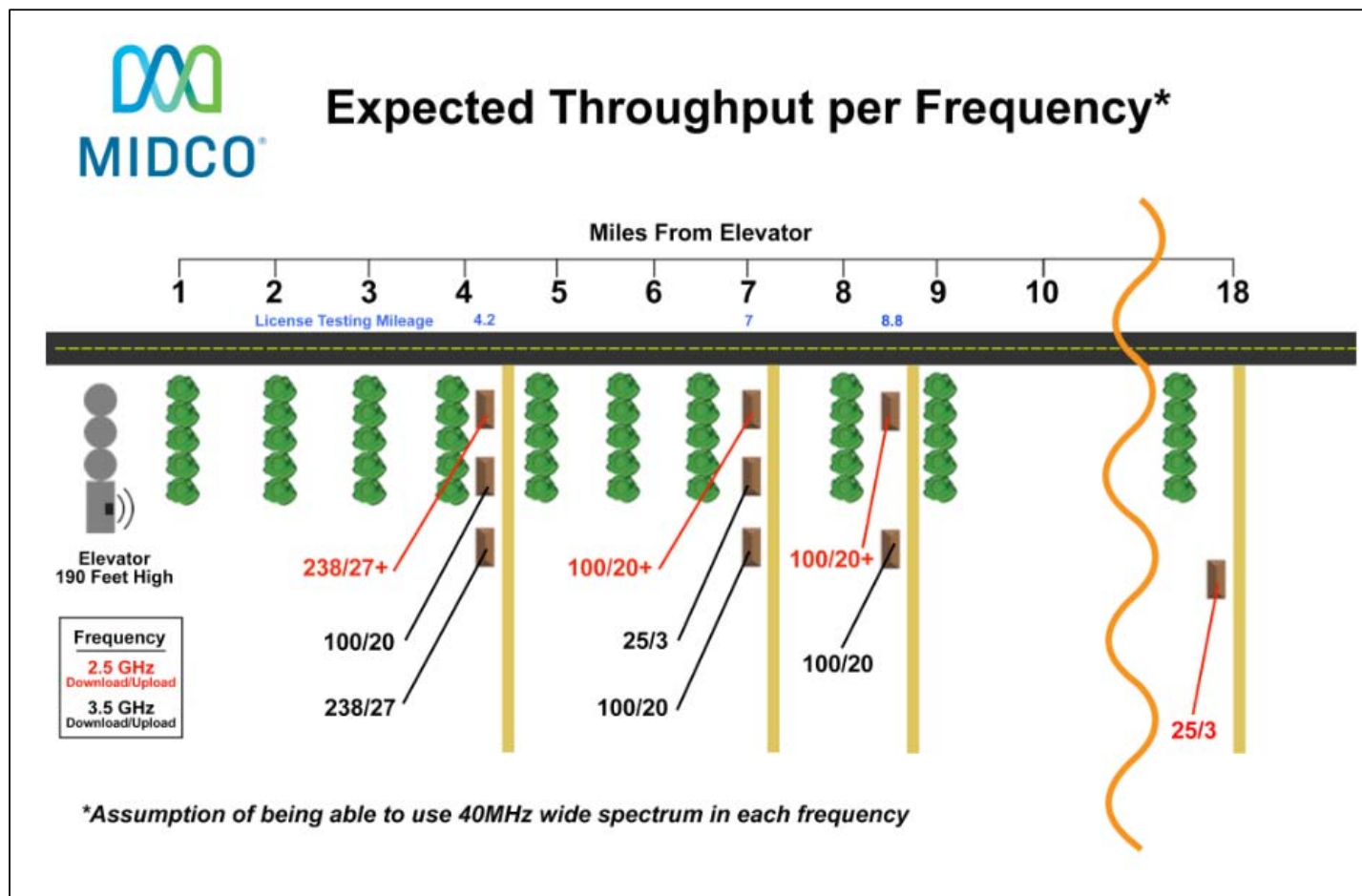
- 39.7% of counties would be covered compared to 38.8% currently
- Overlay auction for white spaces

Serve Rural America Now

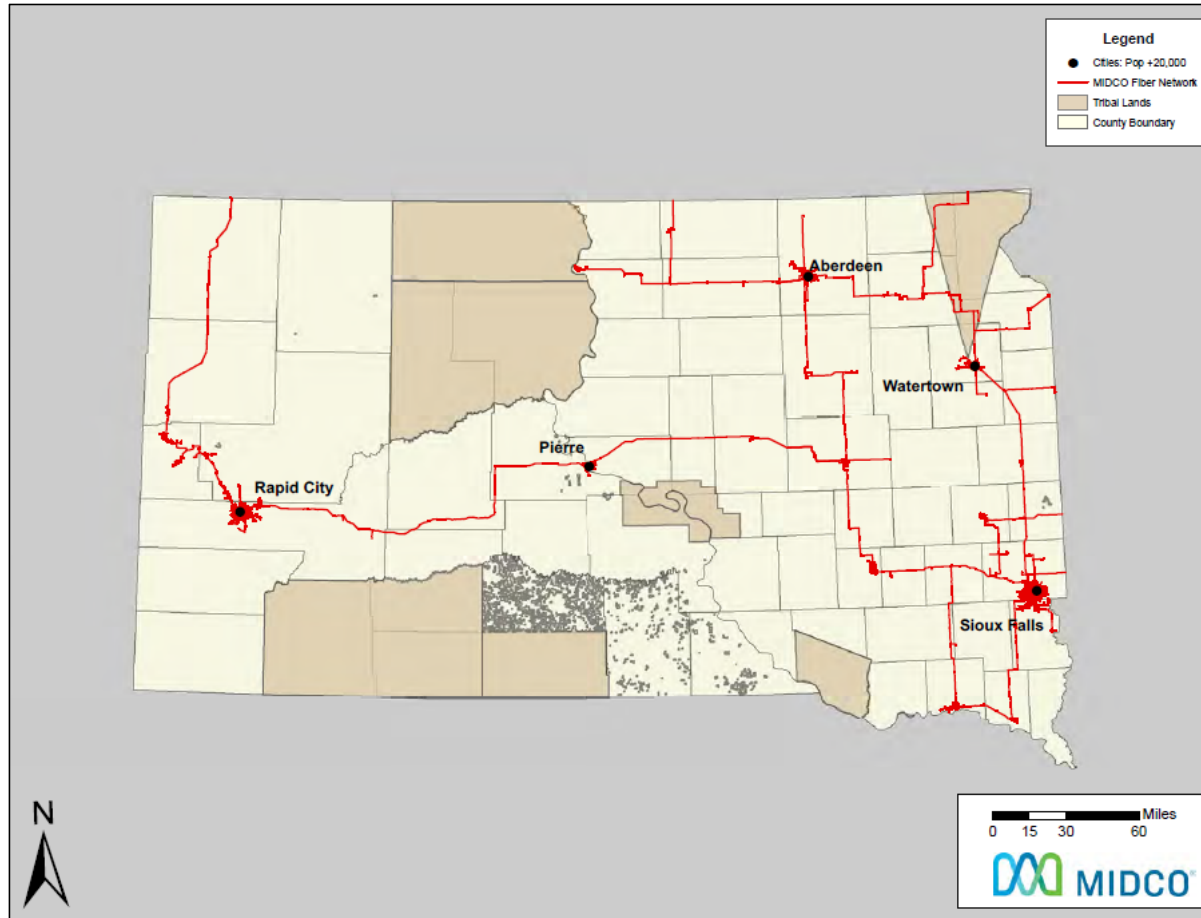


- “4.5G” or “next generation” LTE, carrier-grade equipment exists now for the 2.5 GHz band
- One sector would cover over 440 square miles
- Over 3,800 people would be covered with one sector

EBS Would Extend Our Coverage

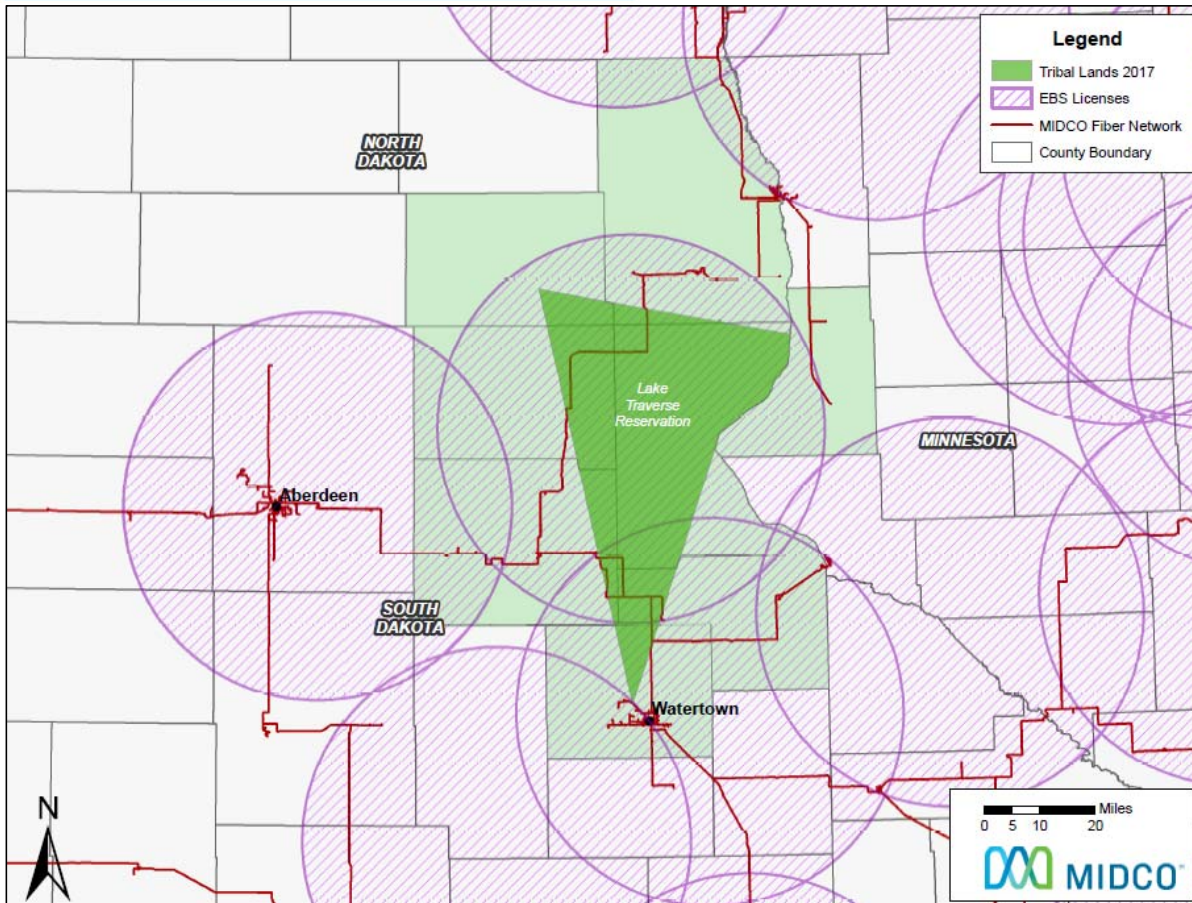


Local Priority Windows



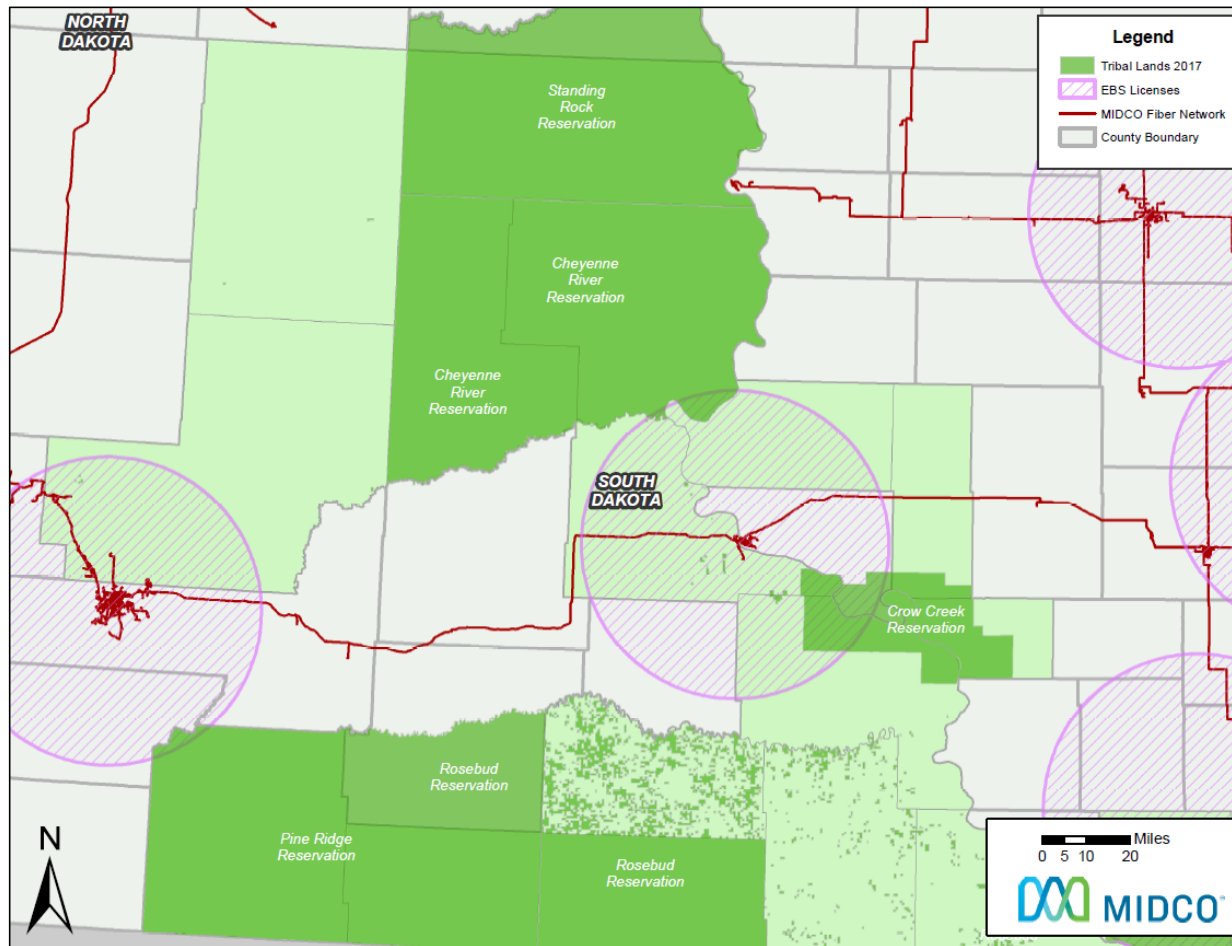
- Policy concerns on **any** local priority windows
- Continues a commercial cycle

Pragmatic Considerations



- Irregularly-shaped white spaces
- Difficult to engineer
- Less attractive for a commercial auction

Pragmatic Considerations Cont.

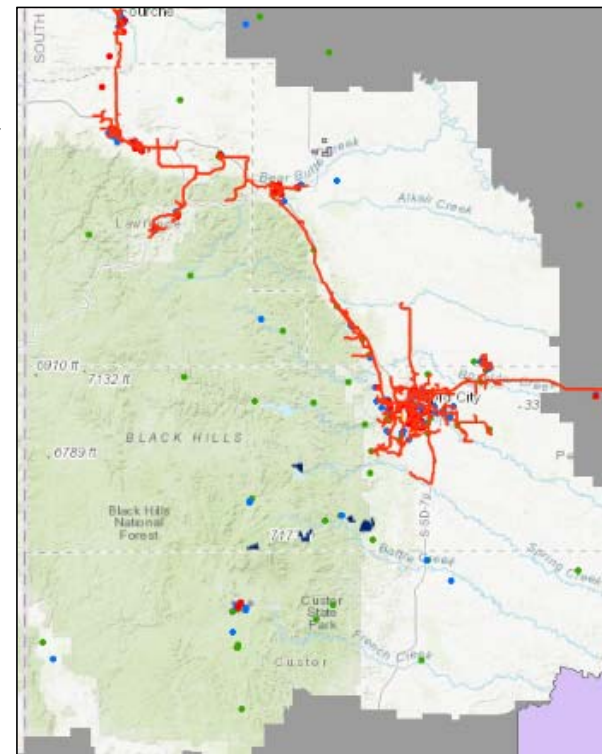


Competitive Auction

- 75% to 80% rationalization on counties
- No local priority windows
- Spectrum limit at auction of 63 MHz, such as:
 - A1-A3 and B1-B3 – 33 MHz of contiguous spectrum in lower band
 - C1-C3 and D1-D3 – 33 MHz of contiguous spectrum in lower band
 - A4, B4, C4, D4, and G4 – 30 MHz of contiguous spectrum in middle band
 - G1-G3 – 16.5 MHz of contiguous spectrum in upper band

Educational Support

- Deposit auction funds in a Homework Gap fund
- Require E-rate participation or other service for educational institutions
- 2.5 GHz band could serve critical, educational, and healthcare sites



Contact Information

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10% Rationalization of County Geography

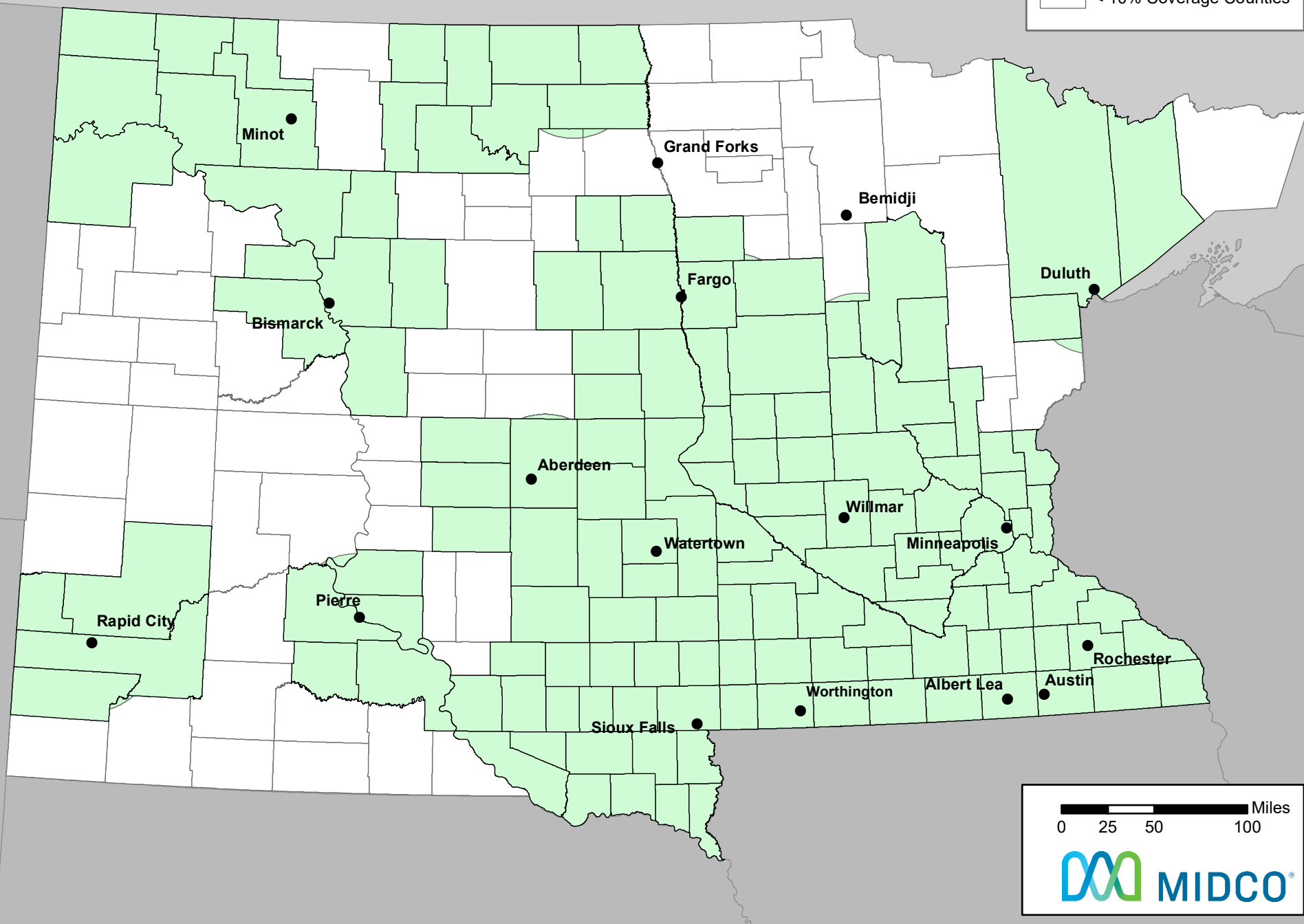
Legend

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Major Cities

> 10% Coverage + Area

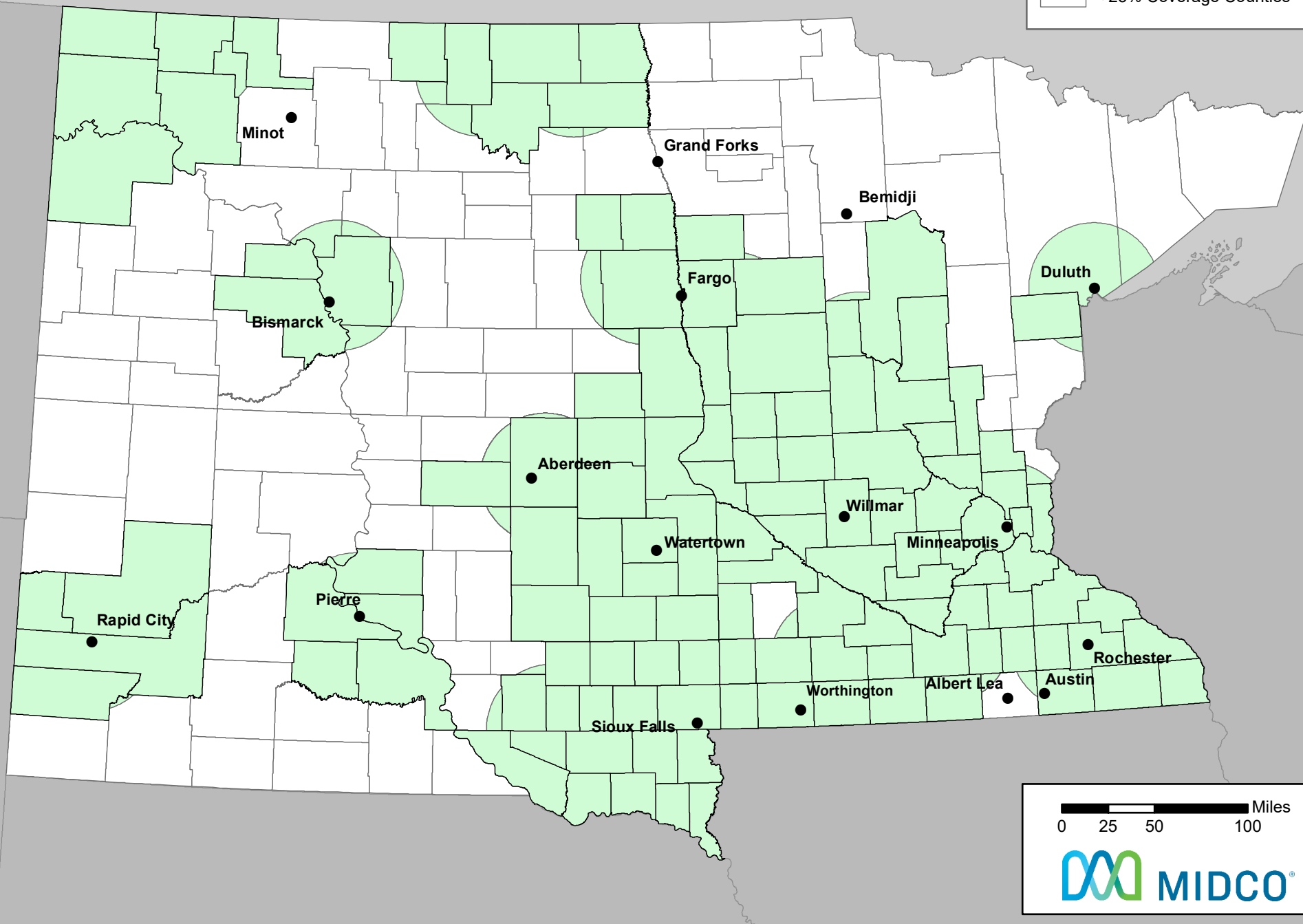
< 10% Coverage Counties



25% Rationalization of County Geography

Legend

- Major Cities
- > 25% Coverage + Area
- < 25% Coverage Counties



50% Rationalization of County Geography

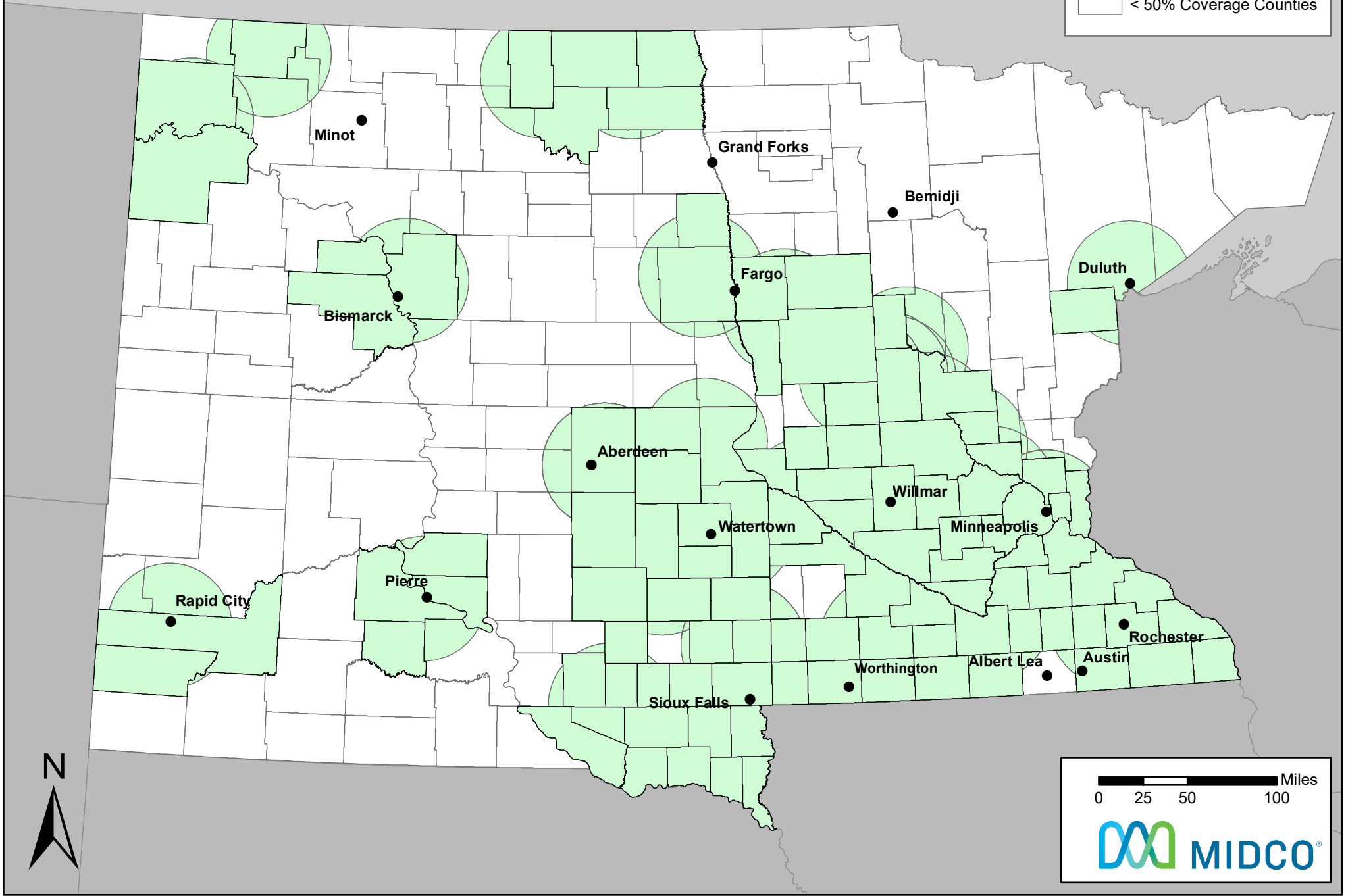
Legend

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Major Cities

> 50% Coverage + Area

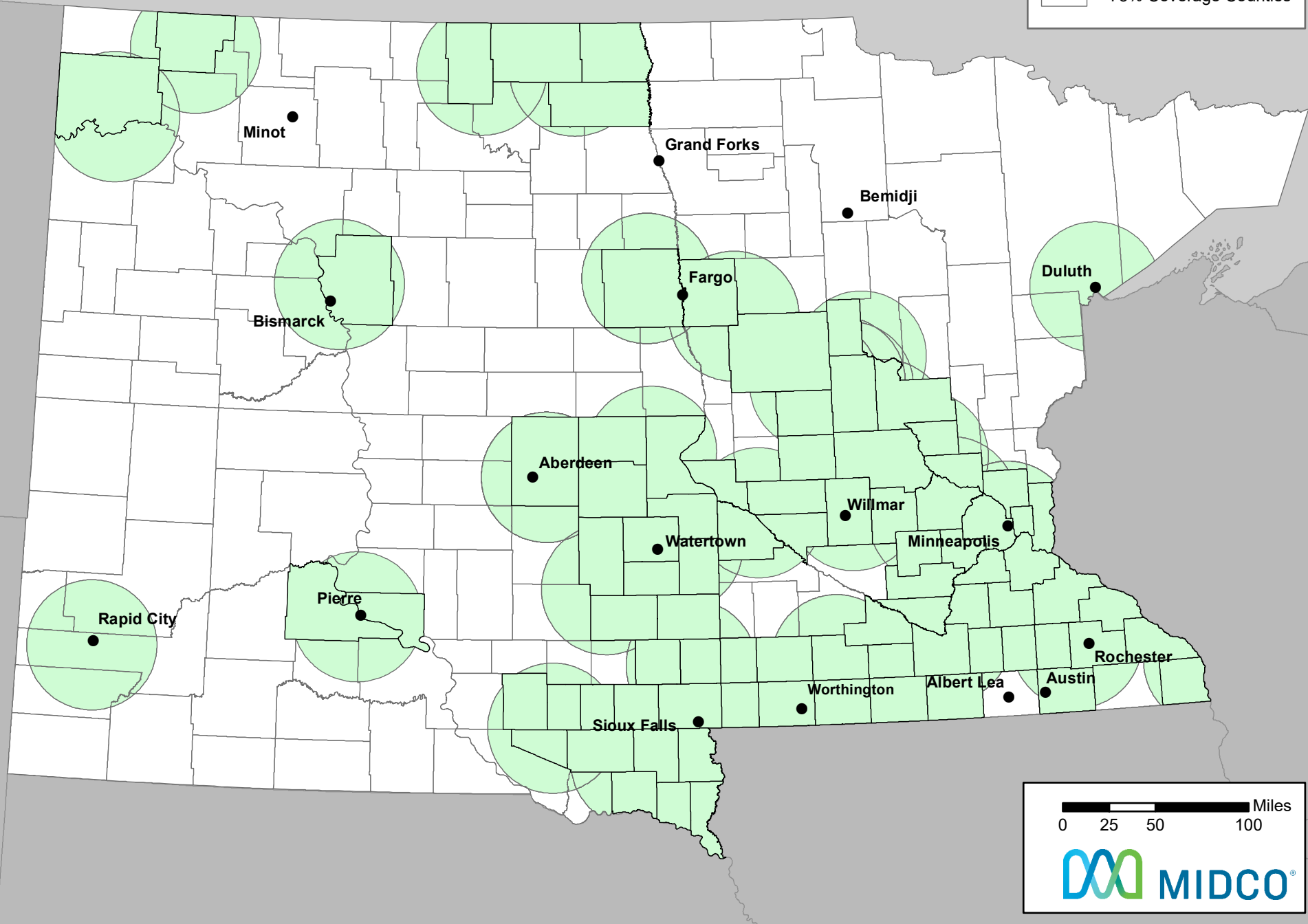
< 50% Coverage Counties



75% Rationalization of County Geography

Legend

- Major Cities
- > 75% Coverage + Area
- < 75% Coverage Counties



80% Rationalization of County Geography

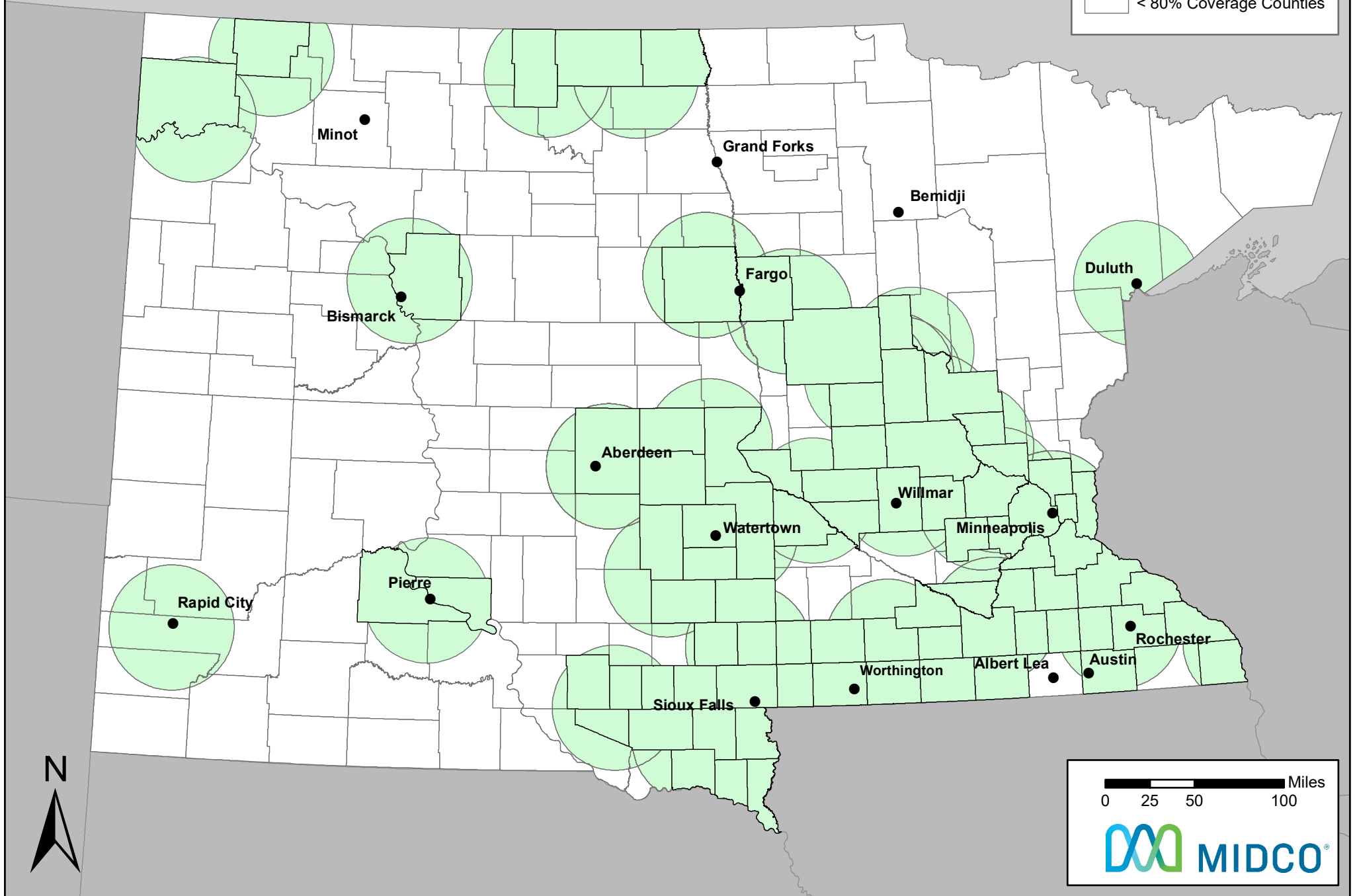
Legend

●

Major Cities

> 80% Coverage + Area

< 80% Coverage Counties



0 25 50 100 Miles

MIDCO®