



FILED VIA ECFS

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

Brian Hendricks
Government Relations
Nokia

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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 13, 2018, Brian Hendricks and Jeffrey Marks of Nokia met in separate meetings with (1) Commissioner Michael O’Rielly and Erin McGrath, Legal Advisor to Commissioner O’Rielly; (2) Louis Peraertz, Senior Legal Advisor to Commissioner Mignon Clyburn; and (3) Will Adams, Legal Advisor to Commissioner Brendan Carr. The attached policy paper served as the basis for our meetings.

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. The goal for the 3.7 GHz band should be to free 80 to 100 MHz of spectrum *per operator, nationwide*, not 100 MHz in total over the next eighteen months to three years, and possibly

not in all geographic areas, as currently proposed. 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, and granting relevant equipment certifications. Particularly 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 ultimate auction for PALs until after auctions for the mmWave bands have been conducted as appears the Commission may be contemplating. 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. We fully support the Commission's draft Order that will make common sense reforms to the Federal environmental, historic and Tribal review processes. This is an excellent beginning to speed 5G deployment. However, Nokia believes that additional progress must be made by the Commission to facilitate reforms to the state and local siting process, which threatens to leave certain communities out of the coming 5G revolution. 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. Further action on siting must be a priority for the Commission in 2018.

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

Respectfully submitted,

/s/ Brian Hendricks

Brian Hendricks

cc: Michael O'Rielly
Erin McGrath
Louis Peraertz
Will Adams