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April 4, 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**

Dear Ms. Dortch:

On April 3, 2019, Justin TerWee, the lead fixed wireless engineer for Midcontinent Communications (Midco), and I met with Aaron Goldberger from Chairman Pai's office via telephonic conference. Midco discussed the above-referenced proceeding, and our Midco Edge Out<sup>SM</sup> 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. 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 discussed our belief that any local priority access windows would only further perpetuate the-already commercial reality of the EBS licenses. Some priority windows in particular could cause pragmatic difficulties in auctioning the remaining white space. We urged the Commission to consider an auction of all white space in county-sized licenses.

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