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Via Electronic Filing

April 5, 2018

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

Re: Notice of Ex Parte Communication: In the Matter of Promoting Investment in the 3550-3700 MHz band; GN Docket 17-258

Dear Ms. Dortch:

On April 3, 2018, the undersigned, Michael Goggin and Neeti Tandon of AT&T Services, Inc., along with Eric DeSilva of DLA Piper, LLC, and Mark Gibson and Ariful Hannon of CommScope, met with Don Stockdale, Mathew Pearl, Paul Powell, Kamran Etemad and Jessica Greffenius of the Wireless Bureau, and Julius Knapp and Robert Pavlock of the Office of Engineering and Technology to discuss the engineering and cost challenges of deploying Radio Access Network (RAN) using census tracts as the baseline license size. While detailed discussion closely followed the attached presentation, AT&T made the following observations and recommendations that the Commission should consider in the proposals contained in the above-referenced proceeding:

- To cover the border areas of census tracts, licensees must severely limit their power and deploy many more CBSDs than what may be actually needed. This will result in:
 - Substantial increase in equipment costs
 - Substantial increase in maintenance costs
 - More backhaul required (even more equipment and costs)
 - More siting approvals for mounting CBSDs needed (local zoning, building owners, etc)
- Net impact is that providers will not be able to deploy networks under standard deployment models, but will instead be forced to deploy very, very dense networks because of:
 - Forced protection of adjacent licensees
 - Forced by irregular borders of Census Tracts

AT&T recommended that larger license sizes, such as PEAs that would permit deploying using higher power for coverage and limiting impact of border areas.



Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS.

Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stacey Black", is positioned above the printed name.

Stacey Black

Cc: WTB\Don Stockdale OET\Julius Knapp
 WTB\Matt Pearl OET\Robert Pavlock
 WTB\Becky Swartz
 WTB\Paul Powell
 WTB\Kamran Etemad
 WTB\Jennifer Greffenius

Attachments: presentation deck