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Ex Parte

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

Re: *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258

Dear Ms. Dortch:

Our members and many other stakeholders are actively researching, developing standards, and testing to deploy services in the 3.5 GHz band. Members of NCTA – The Internet & Television Association (NCTA) are conducting trials and exploring use of the band for both fixed and mobile use cases, and are participants in both the CBRS Alliance and the Wireless Innovation Forum.

Recently, stakeholders have described on the record a variety of possible compromise proposals on license area size—a key issue that has the potential either to increase or to depress interest and investment in the band. In July 2017, NCTA proposed county-sized licenses as a middle ground approach between Partial Economic Areas and census tracts that would strike the right balance between preserving low barriers to entry and minimizing administrative burdens.¹ We continue to believe that making county-sized licenses available in both urban and rural markets is critical to attract a wide variety of investors with different business models, to promote competition and innovation, to maximize auction participation and revenue, and to ensure quick deployment of wireless broadband.

NCTA therefore supports the compromise proposal filed by its member, Charter Communications, Inc., on April 20, 2018.² Under this approach, the Commission would license the top ten percent of Metropolitan Statistical Area (MSA) markets (Cellular Market Areas

¹ NCTA – The Internet & Television Association Comments on Petitions for Rulemaking, GN Docket No. 12-354, RM-11788, RM-11789, at 8-10 (filed July 24, 2017).

² Letter from Elizabeth Andron, Senior Vice President, Regulatory Affairs, Charter Communications, Inc., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-258, at 1 (filed Apr. 20, 2018).

(CMA) 1-30) by county, license CMAs 31-306 by MSA, and license the remaining 428 CMAs by county. This is a limited adjustment to the compromise proposed by CCA and CTIA on April 20,³ but could make all the difference in facilitating new entry and innovation in urban, as well as rural, markets.

Respectfully Submitted,

/s/ Danielle J. Piñeres

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³ Letter from Rebecca Murphy Thompson, Executive Vice President and General Counsel, Competitive Carriers Association, and Scott K. Bergmann, Senior Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-258, at 1 (filed Apr. 20, 2018).