April 26, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**Re:** ***Ex Parte* Communication**

Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz,

GN Docket 17-183

Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122

Dear Ms. Dortch:

On April 25, 2018, Peter Pitsch of Intel Corporation met with Commissioner Michael O’Rielly and his wireless advisor Erin McGrath. Mr. Pitsch made the following points regarding issues relevant to the above referenced proceedings.

1. The Intelsat/Intel/SES flexibility, market-based proposal would provide the eligible FSS satellite operators the flexibility to enable terrestrial mobile use in the 3.7 to 4.2 GHz band, where and when it is efficient at the same time it protects the interests of FSS licensees and their customers.
2. If the demand for terrestrial mobile spectrum is as robust as commonly believed by 5G supporters, this market-based approach would clear additional spectrum beyond the 100 MHz proposed by Intelsat and SES as achievable in the 18-36 months following a final FCC order.
3. A recent Intelsat/SES/Intel ex parte letter provides a licensing timeline that makes clear that the likely terrestrial licensees could be determined within months of the establishment of FCC rules implementing the flexibility proposal.
4. A voluntary incentive auction would not work well in this band (in contrast to the 600 MHz band), because each of the FSS licensees has a non-exclusive right to use the entire band. Such an auction would likely require substantial mandatory relocation of these licensees and their terrestrial customers at government-determined cost.
5. The only other alternative to the flexibility proposal is a forced reallocation.
6. Given the history of long delays in the many previous forced reallocations, the flexibility proposal would enable more terrestrial use in the near and intermediate term, while protecting incumbent satellite operations -- thus better serving the public interest.
7. Based on previous economic analyses, the consumer surplus from making additional terrestrial mobile spectrum available (i.e., the benefit to consumers from the new service beyond what it costs them) would likely be an order of magnitude greater than the marketplace value of the spectrum.
8. Accordingly, the FCC should expeditiously begin a rulemaking to implement the Intelsat/SES/Intel flexibility proposal in this band.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, a copy of this letter is being provided to the above mentioned parties. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Peter K. Pitsch

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Associate General Counsel

Intel Corporation

Cc:

Commissioner Michael O’Rielly

Ms. Erin McGrath