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April 30, 2018

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

Re: *Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands – WT Docket No. 18-120 – NOTICE OF EX PARTE PRESENTATION*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's Rules to report that on April 27, 2018, Todd Gray, representing the National EBS Association, and the undersigned, representing the Catholic Technology Network, met with Nicholas Degani and Rachael Bender of Chairman Pai's office regarding the draft Notice of Proposed Rulemaking (NPRM) in above-referenced proceeding. We expressed our support for the initiation of this proceeding and intention to work with the Commission to ensure that unlicensed EBS spectrum is put to use for the benefit of educators, broadband service providers, and the public. We raised the following issues as being of potential concern based on our preliminary review of the NPRM: (1) use of census tracts for licensing may not be as efficient as use of counties; (2) mutually exclusive applications for new licenses may be more prevalent than anticipated in the NPRM; (3) requiring a 20% spectrum reserve for new licenses appears inconsistent with other proposals in the NPRM; (4) eliminating the current 30-year term limit for EBS leases going forward may not be in the best interest of EBS licensees. We noted that given the complexity of some of the issues raised in the NPRM, it would be helpful if additional time is provided for EBS licensees to comment on the proposals put forth in the NPRM. Pursuant to Sections 1.1206(b)(2) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission.

Respectfully submitted,

/s/ Edwin N. Lavergne

Edwin N. Lavergne

cc Nicholas Degani
 Rachael Bender
 Todd Gray
 John Schauble