

April 30, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street Southwest
Washington, D.C. 20554

Re: Ex Parte Letter, *Transforming the 2.5 GHz Band*, WT Docket No. 18-120

Dear Ms. Dortch:

As wireless internet service providers striving to close the digital divide in rural America, we write to express our enthusiastic support for the Commission to make available new Educational Broadband Service (EBS) licenses to educators via priority licensing windows. Schools, universities, and nonprofits have been waiting for over 23 years for the Commission to finish licensing this critical spectrum band. Since the last major EBS rulemaking, an entire ecosystem of affordable equipment and technical expertise has developed in the 2.5 GHz band, making EBS a key tool to closing the digital divide.

Access to spectrum is a critical ingredient to achieving our shared goal of serving rural communities with affordable, high-speed broadband access. EBS provides operators like us with a unique opportunity to partner with local educators and provide access not only to our schools but also to our entire communities. Priority filing windows would quickly put EBS spectrum in the hands of schools and local operator partners who are eager and ready to build out.

Licensing EBS to schools and retaining the current eligibility requirement in no way prevents commercial operators from gaining access to this band. In fact, quite the opposite is true. EBS provides affordable partnership options to rural operators who can partner with EBS licensees to build out broadband networks to connect their otherwise unserved or underserved communities. The Commission can promote these successful public-private partnerships by licensing unassigned EBS spectrum through the use of priority filing windows.

We strongly oppose auctions of EBS spectrum before educators have had an opportunity to obtain new EBS licenses. Like educators, many of our companies are unable to compete with larger broadband providers—some of whom have received significant federal subsidies—in any form of auction. In addition, an auction would further delay making this spectrum available and putting it to use to provide much-needed broadband service in our communities.

We commend the Commission for seeking to finish licensing the EBS band. In order to reach our shared goal of closing the digital divide, we strongly urge the Commission to open new licensing windows to educators.

Respectfully submitted,

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Cc: The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Geoffrey Starks, Commissioner