

May 2, 2019

Ex Parte

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

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

Dear Ms. Dortch:

On Wednesday, April 30, 2019, Katherine Messier of the North American Catholic Educational Programming Foundation, Inc. (NACEPF) and Mobile Beacon and I met with Matthew Pearl, John Schauble, Jonathan Campbell, Catherine Schroeder, and Nancy Zaczek of the Wireless Telecommunications Bureau. In our meeting, we discussed issues raised in NACEPF and Mobile Beacon's recent filing in this proceeding.¹

In particular, we explained why rationalizing all EBS licensees' outdated, circular Geographic Service Areas to standard geographic boundaries is the most expedient way to accelerate rural and 5G deployment and to ensure intensive use of 2.5 GHz spectrum. In contrast, failure to allow existing licensees to expand through rationalization would forestall the rural deployment that would otherwise be accomplished in areas like the Upper Peninsula of Michigan, where Northern Michigan University stands ready to expand operations through rationalization, but would not realistically be able to compete in an auction. Last, we explained that failure to allow all EBS licensees to participate in rationalization would create significant deployment and operational challenges.

Sincerely,



Stephanie Weiner
Counsel to NACEPF and Mobile Beacon

Cc: Jonathan Campbell
Matthew Pearl
John Schauble
Catherine Schroeder
Nancy Zaczek

¹ Letter from Katherine Messier, NACEPF and Mobile Beacon, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed Apr. 25, 2019)