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May 2, 2019

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: WT Docket No. 18-120**  
**Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On April 30, 2019, James Crandall of the American Petroleum Institute (“API”), several members of the API Telecommunications Subcommittee, and the undersigned, met with staff from the Commission’s Wireless Telecommunications Bureau to discuss the Notice of Proposed Rulemaking in the above-referenced docket regarding the licensing of white space in the 2.5 GHz Educational Broadband Service.<sup>1</sup>

During the meeting, API described the growth in need for broadband by critical infrastructure companies. API’s members increasingly require wider-bandwidth digital communications to support applications such as video, monitoring, and control. Unfortunately, broadband services are frequently not available in the rural and remote areas in which the industry operates, or are not suitable for mission critical use due to security, reliability and other concerns. Consistent with its comments in this proceeding, API urged the Commission to adopt a licensing window for critical infrastructure entities, before EBS white space is offered by auction.

Pursuant to Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically for inclusion in the public record of this proceeding. Please contact the undersigned if you have any questions.

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<sup>1</sup> See Transforming the 2.5 GHz band; *Notice of Proposed Rulemaking*, WT Docket No. 18-120 (Rel. May 10, 2018).

## KELLER AND HECKMAN LLP

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We look forward to continuing to work with the Commission on this matter.

Sincerely,

/s/

Greg Kunkle

CC: Blaise Scinto  
John Schauble  
Nancy Zaczek  
Christiaan Segura  
Nadja SodosWallace  
Catherine Schroeder  
Matthew Pearl