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May 6, 2019

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

Re: *ORAL EX PARTE PRESENTATION – Transforming the 2.5 GHz Band  
WT Docket No. 18-120*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(1) of the Commission's Rules to notify the Commission that on Friday, May 3, 2019, the undersigned counsel for the Wireless Communications Association International ("WCA") met with Aaron Goldberger, Acting Legal Advisor to Chairman Ajit Pai. During the course of the meeting, we reiterated the advocacy positions WCA had advanced in its comments and reply comments in this proceeding. In particular, we emphasized that WCA's proposal for rationalizing Educational Broadband Service ("EBS") Geographic Service Areas to county boundaries without regard to the size of the current overlap was a practical solution to the limitations of the Commission's Universal Licensing System. This approach will provide substantial benefits to the public, as it will allow for the rapid introduction of broadband service in underserved areas. Unlike alternative proposals, this approach also is most likely to result in auctioning of the EBS white space without the years of delay that otherwise would be required to identify the specific geographic areas available at auction. We also reiterated WCA's arguments against the use of an incentive auction regime for licensing EBS white space. And, we noted the benefits of auctioning the 70 MHz Lower Band Segment spectrum in a single block given that 40 MHz of spectrum appears to be the minimum necessary to provide a robust broadband service in today's marketplace.

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Pursuant to Sections 1.1206(b)(1) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,

/s/ Mary N. O'Connor  
Mary N. O'Connor  
Paul J. Sinderbrand

Counsel to the Wireless Communications  
Association International

cc: Aaron Goldberger