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May 14, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: ***Transforming the 2.5 GHz Band***
WT Docket No. 18-120
Notice of Oral Ex Parte Communications

Dear Ms. Dortch:

On behalf of the Wireless Internet Service Providers Association (“WISPA”), on May 13, 2019 the undersigned met in separate meetings with (1) Aaron Goldberger, legal advisor to Chairman Ajit Pai, and (2) Erin McGrath, legal advisor to Commissioner Michael O’Rielly. The purpose of the meeting was to discuss the above-referenced proceeding.

I emphasized the strong interest among WISPA’s members in obtaining access to 2.5 GHz spectrum and support for rules that eliminate inefficient spectrum allocation processes. With respect to existing EBS spectrum, I reiterated that the Commission should eliminate leasing, ownership and educational requirements, and should rationalize existing Geographic Service Areas by extending them to the county border. With respect to unassigned EBS spectrum, I noted WISPA’s preference for an open eligibility auction designed with appropriate safeguards to ensure that one entity could not acquire all available spectrum in a geographic market, consistent with WISPA’s Comments in the record.¹ WISPA proposed that, where all EBS channels are available, the Commission should create four separate spectrum blocks, as follows:

- A1-A3 and B1-B3 – a 33 megahertz contiguous block of spectrum;
- C1-C3 and D1-D3 – a 33 megahertz contiguous block of spectrum;
- A4, B4, C4, D4 and G4 – a 30 megahertz block of contiguous spectrum; and
- G1-G3 – a 16.5 megahertz contiguous block of spectrum

¹ See WISPA Comments, WT Docket No. 18-120 (filed Aug. 8, 2018).



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I further emphasized that this auction structure must include a rule stating that no bidder should be permitted to acquire more than 63 megahertz of spectrum (not including guard band channels) – or roughly half of the available spectrum in areas where all five channel groups are available at auction. This safeguard would ensure that at least two companies would hold 2.5 MHz spectrum in a given area.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in the above-referenced docket. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

cc: Aaron Goldberger
Erin McGrath