



May 17, 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, May 15, 2019, Alan Hill of J.A. Hill Group, LLC and I spoke via telephone to Nick Degani, Senior Counsel to Chairman Pai, about the above-captioned proceeding. In our conversation, we discussed issues raised in Voqal's previous filings in the proceeding.¹

In particular, we explained how the Commission can best achieve its goal of intensive use of Educational Broadband Service (EBS) spectrum—while promoting both rural deployment and educational connectivity—by automatically rationalizing existing license areas along county lines for all licensees and by modernizing, but retaining, its educational eligibility and usage rules. With respect to unassigned EBS spectrum, we discussed the recent letter filed by fifty-seven rural operators² opposing EBS auctions and how priority windows for tribal and educational entities would speed licensing, accelerate deployment, and achieve spectrum policy diversity that will help bridge the digital divide. We also discussed how EBS partnerships have proven to connect those without broadband in places like Red Cliff, Colorado, and the base of the Grand Canyon.

Finally, as requested by Schools, Health & Libraries Broadband Coalition (“SHLB”), Voqal, and others,³ we urged the Commission to issue a public notice requesting additional comment in this proceeding to ensure an adequate record before any decisions are made about the future of EBS. For example, the Office of Economics and Analytics and Wireless Telecommunications Bureau

¹ See, e.g., Comments of Voqal, WT Docket No. 18-120 (filed Aug. 8, 2018); Reply Comments of Voqal, WT Docket No. 18-120 (filed Sept. 7, 2018); Letter from Mark Colwell, Director of Telecommunications Strategy, Voqal, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed May 9, 2019).

² Letter from Fifty-Seven Rural Broadband Operators, Educators and Broadband Providers for Rural American Communities, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed Apr. 30, 2019).

³ See Letter from John Windhausen, Jr., Executive Director, SHLB, et. al., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed May 13, 2019).

Ms. Marlene H. Dortch

May 17, 2019

Page 2 of 2

should seek comment on Dr. Raul Katz's recent analysis of the social and economic impacts of priority windows as compared to auctions for available EBS spectrum.⁴ In addition, we discussed how the pending merger between Sprint and T-Mobile may have implications for this band that are important to consider when finalizing EBS rules. The Commission should take the time to get EBS right.

Sincerely,

_____/s/_____
Mark Colwell

Director of Telecommunications Strategy
Voqal

P.O. Box 6060
Boulder, CO 80306
(303) 532-2850

Cc: Nick Degani

⁴ See SHLB and Telecom Advisory Services, LLC, *The Economic Benefits of Keeping the "E" in EBS* (May 15, 2019), http://www.shlb.org/uploads/Policy/Policy%20Research/SHLB%20Research/EBSResearchpresentation_final.pdf.