



FILED VIA ECFS

May 22, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20510

Jeffrey Marks
Government Relations
Nokia

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Re: *Notice of Ex Parte Presentation*, GN Docket Nos. 14-177, 15-319, 17-183, 17-258; IB Docket Nos. 97-95, 15-256; WC Docket No. 18-89; WT Docket Nos. 10-112, 17-79

Dear Ms. Dortch:

On May 18, 2018, Rajeev Suri, Chief Executive Officer, and Rick Corker, EVP and President, North America (together, the “Nokia Executives”), and Jeffrey Marks, Senior Counsel, Policy and Regulatory, all of Nokia, met with the Commission as follows:

- Mr. Suri met with Chairman Ajit Pai;
- Messrs. Corker and Marks met with Commissioner Michael O’Rielly and Erin McGrath, Legal Advisor to Commissioner O’Rielly; and
- Messrs. Corker and Marks met with Commissioner Jessica Rosenworcel and Umair Javed, Legal Advisor to Commissioner Rosenworcel.

In these meetings, the Nokia Executives advocated on key proceedings before the Commission.

Specifically, the Nokia Executives thanked the Commission for innovative spectrum policies that unlocked the potential of gigabits of spectrum, including the 3.5 GHz and mmWave bands. However, the Commission should move more quickly to get those spectrum bands into the market via auction so that they can be put to use. The Nokia Executives asked that the Commission expedite auctioning mid-band and mmWave spectrum bands, and hold auctions that cover more than one band at a time, which will speed deployment of 5G services to American consumers.

The Nokia Executives stressed the urgency to make spectrum available in the 3.7 to 4.2 GHz band for terrestrial use as the centerpiece for nationwide 5G deployment in the U.S. The proposal of Intelsat and SES to unlock only 100 MHz of spectrum for 5G over 3 years is not sufficient to meet the needs of wireless operators, or to keep the U.S. competitive with the emerging 5G plans in China,

Japan and Korea. However, the proposal for a market-based solution, which SES and Intelsat contemplate, is appropriate. The goal for the 3.7 GHz band should be to free 80 to 100 MHz of spectrum *per operator*, nationwide.

With respect to the 3.5 GHz band, the Nokia Executives urged that the Commission expedite processing and approving proposals for spectrum access system (SAS) administrators, including Nokia's own SAS submission, and granting relevant equipment certifications. Particularly since no auction is required for General Authorized Access operations, the goal should be to authorize deployments in the 3.5 GHz band by the end of 2018. With respect to Priority Access Licenses (PALs), the Commission should not delay the development of auction rules, and the ultimate auction for PALs until after auctions for the mmWave bands have been conducted as appears the Commission may be contemplating. Rather, the Commission should lay the groundwork for the auction of multiple bands simultaneously, so that 3.5 GHz auctions do not slip into 2020.

The Nokia Executives thanked the Commission for the recently adopted common sense reforms to the Federal environmental, historic preservation and tribal review processes, and for the commitment to act in the near-term on state and local siting reforms. While we recognize the legitimate interests that states and localities have in infrastructure siting, we also advocate that there be a regulatory backstop for parties to seek recourse at the Commission when the system breaks down. The Nokia Executives urged further action on siting must be a priority for the Commission in 2018.

Additionally, Nokia supported the Commission on efforts to ensure that Universal Service funds not be used to purchase equipment that is a threat to national security. However, Nokia urged that the proceeding not be used to cast uncertainty on the entire industry, including longstanding, well-vetted partners of U.S. government and industry, like Nokia. The Commission should make this clear to avoid dampening investment by operators that rely on Universal Service to bring broadband services to communities that need it most.

Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

/s/ Jeffrey Marks

Jeffrey Marks

cc: Chairman Ajit Pai
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Erin McGrath
Umair Javed