

April 16, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, and Commissioner Rosenworcel,

We write today regarding your recent Notice of Proposed Rulemaking that proposes to change how licenses are issued in the 3.5 GHz Band. Expanding access to broadband is critical for our rural communities. Access to fast, reliable, and affordable broadband breaks down geographical barriers and allows rural communities to participate in the 21st century economy. The 3.5 GHz band holds great potential for next generation connectivity and for ensuring that America is a leader in 5G and can also provide a cost-effective solution for delivering fixed wireless broadband in rural areas.

We understand that one of the issues the Commission is considering in its proceeding is the size of the geographic areas throughout which the 3.5 GHz band will be licensed. There are arguments to be made for larger licenses to avoid interference and cater to urban areas and arguments to be made for small licenses to laser focus on rural areas. After examining the policy and technical arguments, we believe that there is a path forward to balance the needs of highly populated areas with those of our rural communities.

One way the Commission could meet this challenge is to license spectrum using county-equivalent areas or Cellular Market Areas (CMAs) or a combination thereof. The use of county-equivalent areas will allow rural providers to participate in the 3.5 GHz auction for Priority Access Licenses and further deploy rural broadband service. Further, the Commission has frequently licensed spectrum using CMAs with great success. CMAs are comprised of 306 Metropolitan Statistical Areas (MSAs) that cover the most populated areas of the country and 429 Rural Service Areas (RSAs) that cover the rural parts of the country. The use of MSAs for our urban areas would allow larger carriers to deploy networks without the fear of interference or degradation of their signals. Additionally, a hybrid model of MSAs and county-equivalents could allow for the best penetration and expansion into our rural areas. As many of us have discussed before, a solution that works in the heart of New York City, probably will not work in Treasure County, Montana.

We encourage the Commission to reject the expansion of geographic licensing areas such as large scale Partial Economic Areas (PEAs) and instead work with all stakeholders to come to

a balanced approach using medium sized license areas. It is important that our rural areas do not get left behind again. We believe these options strike the right balance of interests in this proceeding.

Thank you for your attention to this matter and for your ongoing efforts to expand broadband connectivity across the United States.

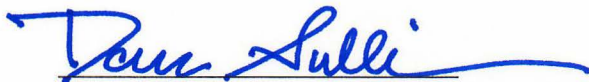
Sincerely,

A handwritten signature in blue ink that reads "Steve Daines". The signature is fluid and cursive, with the first name "Steve" written in a larger, more prominent script than the last name "Daines".

STEVE DAINES
United States Senator

A handwritten signature in blue ink that reads "John Barrasso". The signature is written in a cursive style, with the first name "John" and last name "Barrasso" clearly legible.

JOHN BARRASSO, M.D.
United States Senator

A handwritten signature in blue ink that reads "Dan Sullivan". The signature is written in a cursive style, with the first name "Dan" and last name "Sullivan" clearly legible.

DAN SULLIVAN
United States Senator



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 16, 2018

The Honorable John Barrasso
United States Senate
307 Dirksen Senate Office Building
Washington, D.C. 20510

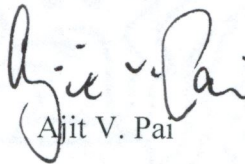
Dear Senator Barrasso:

Thank you for your letter regarding the Commission's review of mid-band spectrum in the 3.5 GHz band. I share your concern about promoting access to fast, reliable, and affordable broadband that serves the needs of rural communities.

Commissioner O'Rielly has been heading up the Commission's efforts to review the 3.5 GHz band, including through the issuance of a Notice of Proposed Rulemaking to consider certain adjustments to existing rules. I will share your concerns with him as we work to reexamine the existing rules, including rules to expand licensed access to spectrum in the 3.5 GHz band.

I appreciate your interest in bringing broadband to unserved and underserved communities. Your views will be entered into the record of the current 3.5 GHz rulemaking proceeding and considered as part of the Commission's review. Please let me know if I can be of any further assistance.

Sincerely,


(Ajit V. Pai)



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 16, 2018

The Honorable Dan Sullivan
United States Senate
702 Hart Senate Office Building
Washington, D.C. 20510

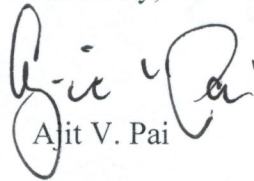
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Sincerely,


Ajit V. Pai

Senator, thanks for taking the time to chat with me about a few issues - appreciate you, and your staff's, willingness to work with us.



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May 16, 2018

The Honorable Steve Daines
United States Senate
320 Hart Senate Office Building
Washington, D.C. 20510

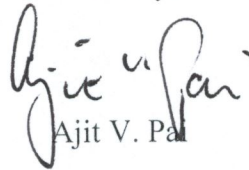
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Sincerely,


Ajit V. Pai

P.S. Senator, I hope all's well with you! Look forward to catching up with you sometime.