



May 21, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

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

Dear Madam Secretary:

On behalf of the National Collaboration for Digital Equity (NCDE), I write to express support for the Federal Communications Commission to issue a public notice seeking additional comment on issues that remain incomplete in the record.¹ This is particularly necessary to allow for a robust discussion of a recently-filed economic and social impact study conducted by Dr. Raul Katz regarding the Educational Broadband Service (EBS). Dr. Katz presented his findings immediately following the NCDE's recent National Summit on Digital Equity and Economic Inclusion on May 14-15 in Washington, D.C.²

As Dr. Katz explained, issuing EBS licenses to local educational entities would provide greater benefits than conducting an overlay auction of EBS spectrum. NCDE and presumably many other parties would like to examine this research. If the FCC acts too quickly, it will deny our group and many others an opportunity to offer meaningful public input on this new evidence. To date, this appears to be the only economic analysis regarding EBS that has been presented to the Commission.

¹ See Letter from John Windhausen, Jr., Executive Director, Schools, Health & Libraries Broadband (SHLB) Coalition, et. al., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed May 13, 2019); Letter from Candice Dodson, Executive Director, SETDA & Keith Krueger, Chief Executive Officer, CoSN, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed May 15, 2019).

² See EventZilla, *2nd National Annual Summit on Digital Equity and Economic Inclusion*, <https://www.digitalequity.us/national-summit.html> (last visited May 13, 2019). Dr. Katz also presented his preliminary findings to the Commission and submitted them to the record. See Letter from John Windhausen, Jr., Executive Director, Schools, Health & Libraries Broadband (SHLB) Coalition, et. al., to Marlene H. Dortch, Secretary, FCC, WT Docket No. 18-120 (filed May 17, 2019).

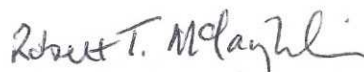
NCDE partners include state education agencies, school districts, educational nonprofits, broadband service providers, and some of the nation's largest financial institutions. NCDE's members include executive leadership of over three dozen mostly national organizations in education, digital equity and economic inclusion (cf. <https://www.digitalequity.us/about.html>).

NCDE was created with a mission of closing the digital divide barriers to economic inclusion and opportunity in America. Attendees of the summit were excited to learn about EBS and its potential in achieving this goal. For many attendees, this was the first they had learned about this promising opportunity for cost effectively providing affordable broadband in underserved areas. You can learn more about NCDE and its programs at www.digitalequity.us.

The central focus of the NCDE summit related to how banks that are required to dedicate a portion of their proceeds to low- and moderate-income areas under the Community Reinvestment Act (CRA) can meet this obligation. As of 2016, resulting from our pilot and policy advocacy efforts, the Federal Reserve Board issued guidance allowing banks' CRA funds to finance digital divide projects across the country, soon echoed by its sister CRA regulatory agencies, the Treasury Department's Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation. Banks annually commit over \$100 billion for economic opportunity in low- and moderate-income communities, so that this policy shift opens up very substantial, sustained funding for EBS-based broadband access in underserved areas. Banks are very excited about the potential to support EBS projects. They understand that the 2.5 GHz band has unique characteristics that make it economical for deployment. Unlike other spectrum bands, the existing ecosystem of 2.5 GHz equipment is available, making it affordable to deploy broadband networks even in the most rural and remote areas of the country. Also, the 2.5 GHz band allows for a higher power levels than other spectrum, allowing broadband signals to reach further and through mountainous and forested areas.

NCDE members believe EBS presents a real opportunity to cost effectively close the digital and educational divide that would be forever lost should the Commission decide to auction this spectrum. We urge the Commission to open an additional comment period to allow parties the ability to weigh in on this critical study. The Commission should not move forward to decide the future of the EBS band until there is a complete record evaluating the economic and social impacts of how best to allocate available EBS spectrum.

Sincerely,



Robert McLaughlin

Executive Director

National Collaboration for Digital Equity