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June 14, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 19-116; IB Docket No. 11-109; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091

Dear Ms. Dortch:

On June 14, 2019, Valerie Green, Executive Vice President and Chief Legal Officer of Ligado Networks LLC (“Ligado”), and the undersigned met with Evan Kwerel, Margaret Wiener, Martha Stancill, Paul LaFontaine, and Pat DeGraba of the Office of Economics and Analytics (“OEA”), and Paul Murray of the Office of Engineering and Technology (“OET”). Greg Rosston, Senior Fellow at Stanford Institute for Economic Policy Research and Director of the Public Policy program at Stanford University, and Jeremy Bulow, Professor of Economics at Stanford Business School, both economic consultants to Ligado, and Anna Gentry, Becky Schwartz, and Paul Powell of the Wireless Telecommunications Bureau (“WTB”) participated by telephone.

During the meeting, the parties discussed the Notice of Proposed Rulemaking (“NPRM”) to reallocate the 1675-1680 MHz band to shared use and to assign the spectrum through an auction.¹ In connection with a future auction of that band, the Ligado representatives stated that if the Commission approves the company’s pending license modifications to enable it to use 35 MHz of vital lower mid-band spectrum for 5G, then the company would plan to participate actively in an auction for the 5 MHz and would expect to meet a reasonable reserve price to ensure the auction was successful. The parties discussed Ligado’s overarching spectrum plan, as set forth in the attachment, and how the 5 MHz relates to the 35 MHz for which the company has pending applications.

The parties discussed why lack of approval of the license modification applications would impair Ligado’s ability to participate robustly in the auction. Because Ligado does not know whether it will be able to use the 35 MHz of spectrum for terrestrial operations, the company cannot determine whether it will be able to create the highest and best use of the

¹ See *In the Matter of Allocation and Service Rules for the 1675–1680 MHz Band*, Notice of Proposed Rulemaking, WT Docket No. 19-116 (May 13, 2019).

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spectrum that is the subject of the auction, which would be to create a 10-MHz contiguous block with the 1670-1675 MHz band.² The parties also discussed whether Ligado can definitively commit to bidding in the auction and concluded that Ligado's commitment necessarily depends on whether the 35 MHz is useful to the company. Therefore, until Ligado's license modifications are decided, it may not be able to participate in an auction for 1675-1680 MHz.

It was noted that the consequence of this uncertainty is that the FCC may have difficulty achieving the outcome specified in the President's budget and likely will end up auctioning the 1675-1680 MHz block for a significantly lower price than the block should be sold for, and to a party that has assigned a low value to the block. Ligado's experts advised that if the block is sold under these circumstances, the spectrum is much less likely to be put into use quickly and is less likely to go to its highest value use. As a result, the FCC's goal – 5G leadership – will be delayed.

The parties concluded by urging the Commission to approve the license modification applications so that the company can participate robustly in the auction and meet a reasonable reserve price.

Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron

Gerard J. Waldron

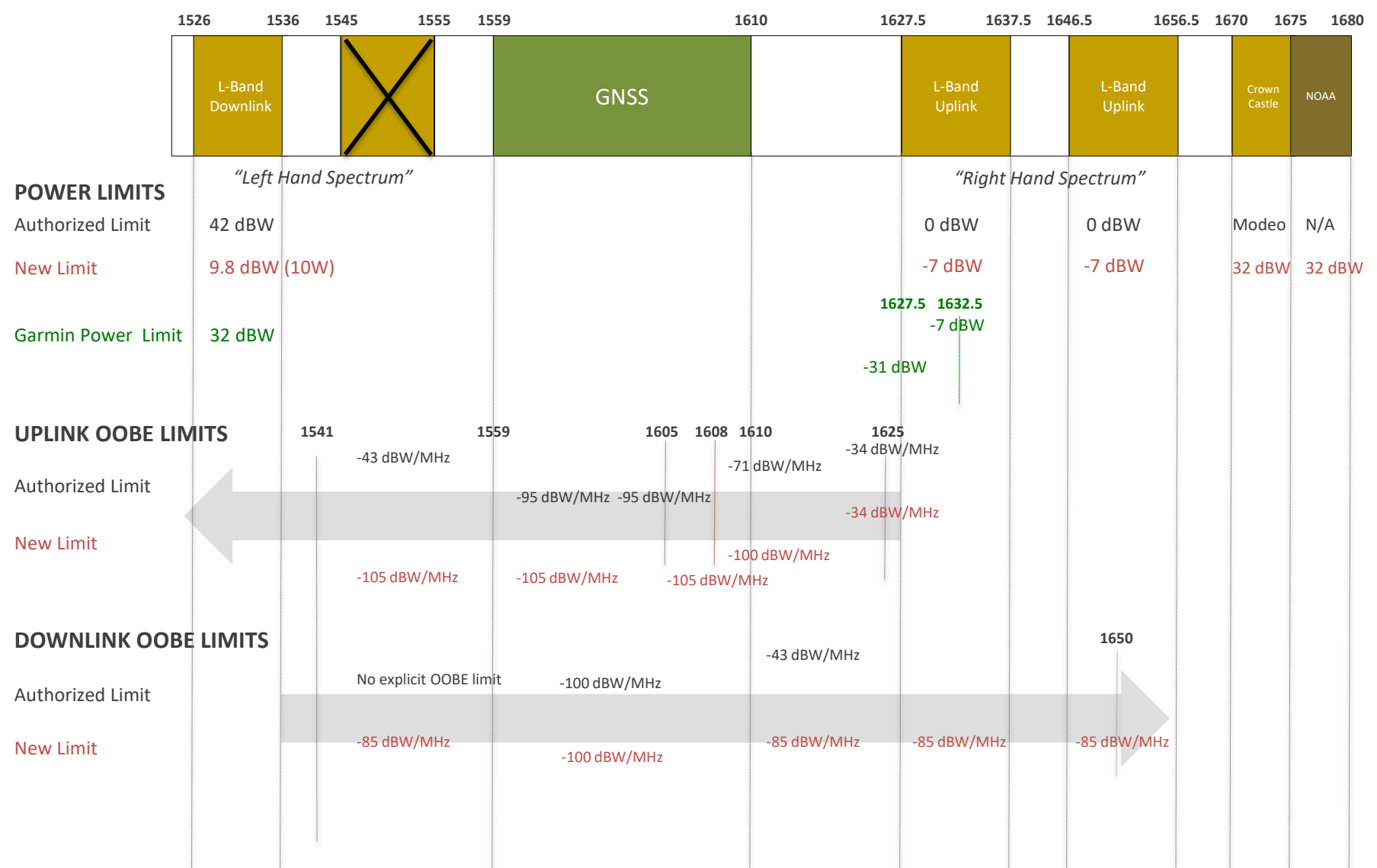
Counsel to Ligado Networks LLC

Attachment

cc: Meeting attendees
Donald Stockdale
Charles Mathias
Ron Repasi
Aaron Goldberger
Erin McGrath
Will Adams
Umair Javed
Randy Clarke

² By dint of an agreement with Crown Castle Inc., the license holder of 1670-1675 MHz band, Ligado has the ability to access and use the 1670-1675 MHz band consistent with the Commission's rules. *See Master Agreement by and among Crown Castle MM Holding LLC, OP LLC, and TVCC One Six Holdings LLC Dated July 16, 2007*, ULS File No. 0003108073 (filed July 17, 2007) (Lease ID L000002305, now L000007295).

Technical Operating Parameters Specified in Coexistence Plans



Note: The Coexistence Plans also include narrowband limits not depicted here.