



July 1, 2019

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

Re: Transforming the 2.5 GHz Band - WT Docket No. 18-120

Expanding Flexible Use of the 3.7 to 4.2 GHz Band, et al – GN Docket No. 18-122; RM-11778; RM-11791

Unlicensed use of the 6 GHz Band – ET Docket No. 18-295

Use of Spectrum Bands Above 24 GHz For Mobile Radio Services – GN Docket No. 14-177

Dear Secretary Dortch:

In accordance with Section 1.1206 of the Commission's rules, we hereby provide you with notice of an ex parte presentation in connection with the above-captioned proceedings. On June 27, 2019, Ted Carlson (Chairman of U.S. Cellular), Joe Hanley (Sr. VP – Telephone & Data Systems, Inc.) along with the undersigned met with Aaron Goldberger of Chairman Pai's office.

During the course of the meeting we discussed the attached presentation regarding EBS spectrum. As part of that discussion, we stressed our support for the band plan proposed in comments by WISPA with a clarification that the J Block would be included with "Block 3" as described in the proposed order. This band plan would provide better opportunities for small and regional carriers to compete and win spectrum essential for the provision of 5G services in rural areas. This plan presents a much better set of options than the "single winner takes all 100 MHz" proposal the Commission is considering in the draft order.

As part of stressing the relative importance of 2.5 GHz, we indicated that based upon

our internal engineering analysis, when comparing radius of a cell site – a carrier needs 64% more cell sites using C Band spectrum than 2.5 GHz spectrum to provide a comparable service.

In addition, in the context of the C Band proceeding, consistent with our prior comments in the docket, we stressed our continued preference for a FCC run public auction of spectrum as opposed to an unconstrained private sale mechanism. We stressed the need to clear as much of C Band as is feasible as quickly as possible in order to maximize the delivery of 5G services in rural America.

In the context of the 6 GHz proceeding, consistent with our prior comments we reiterated our concerns regarding potential interference to our existing fixed microwave operations. We also expressed support for the CTIA proposal to relocate existing licensees in upper 6 GHz to the 7 GHz band and to auction upper 6 GHz for 5G services.

We also stressed the importance that the Commission prioritize an auction of the 26 GHz spectrum and to accelerate Commission action on that band.

Sincerely,

/S/

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

CC: Aaron Goldberger

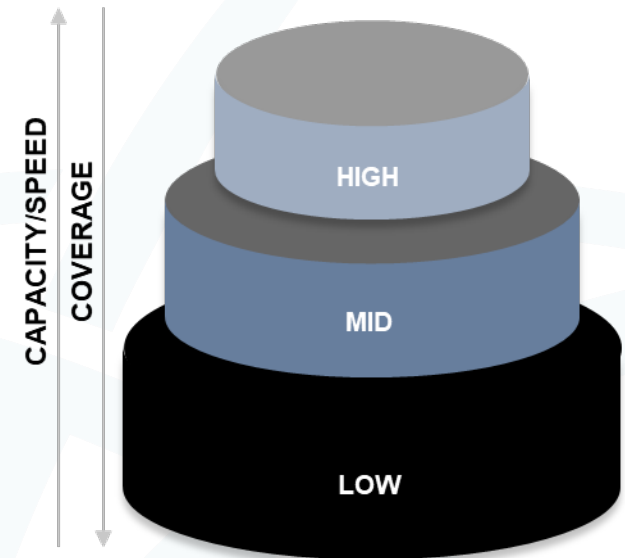


Mid-Band Spectrum Policy Transforming the 2.5 GHz Band

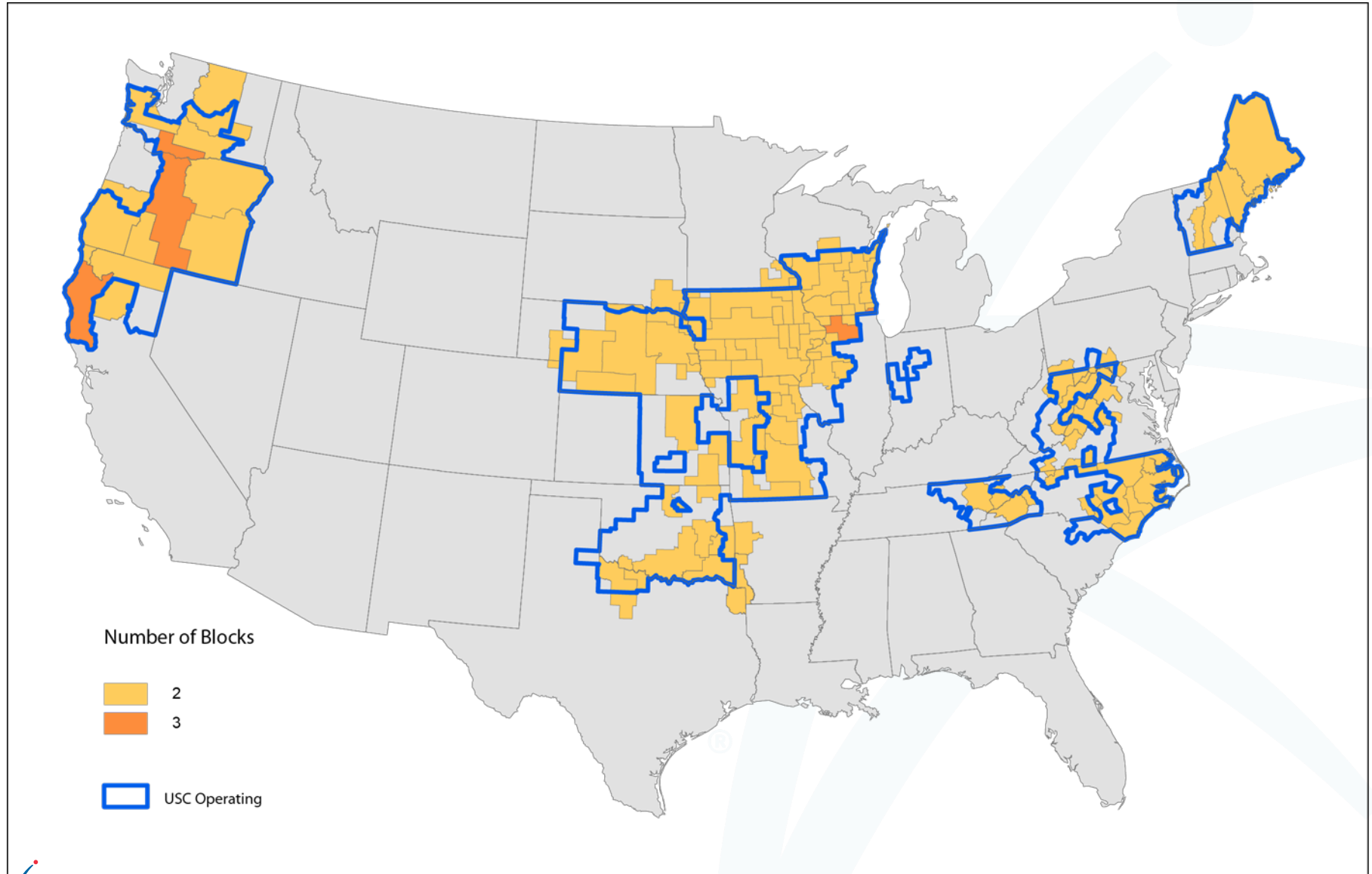
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U.S. Cellular Plans for 5G

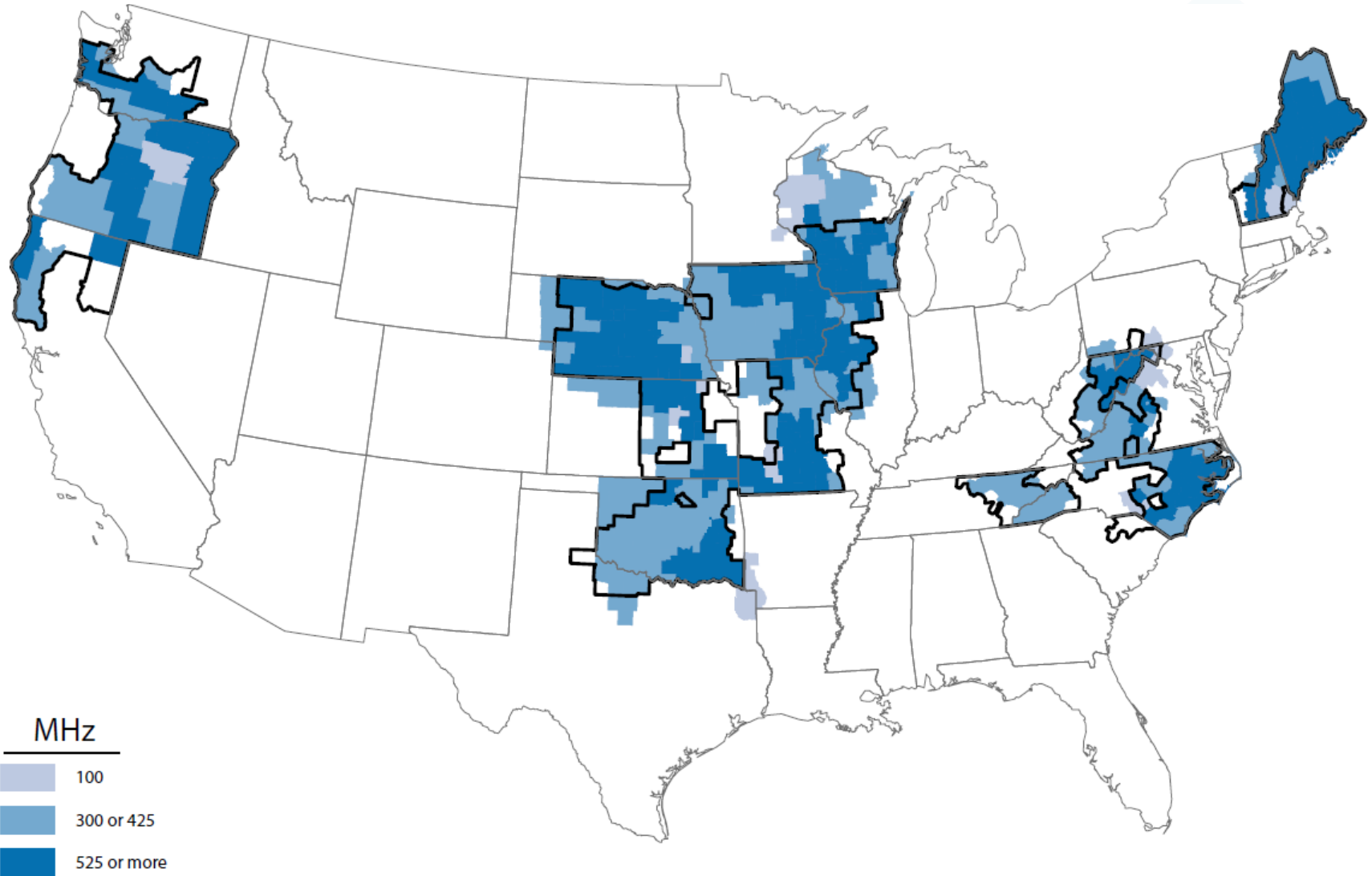
- U.S. Cellular is actively preparing to launch 5G service
- 6th Largest Purchaser of 600 MHz Spectrum
- 2nd Largest Purchaser of 28 GHz Spectrum in Auction 101
- 3rd Largest Purchaser of 24 GHz Spectrum in Auction 102
- Significant need for Mid-Band Spectrum to complete 5G deployment



U.S. Cellular Winning Bids – 600 MHz Auction (1002)



U.S. Cellular Winning Bids – mmWave Auctions (101 and 102)



Mid-Band Policy Priorities

- Mid-band spectrum is an essential element in a 5G network deployment
- Unfortunately, mid-band spectrum is a scarce resource in the U.S.
- CBRS, C-Band, and EBS are all needed and should be accessible to all operators – important to foster competition and innovation in 5G services
- Optimal band plans and auction procedures can promote accessibility and prevent foreclosure, while providing flexibility to all bidders

Proposed EBS Report and Order

- U.S. Cellular supports the FCC's goals and most elements of the proposal:
 - Flexible use, overlay auction with incumbent EBS license areas intact, tribal window, county-sized license areas
- We are concerned about the band plan.
- Proposed 100 MHz spectrum block creates a winner take all scenario which effectively forecloses all other carriers from access.
- WISPA proposed Band Plan is a better solution – retains flexibility for multiple winners, while still allowing a single bidder to acquire 100 MHz of contiguous spectrum and deploy as a single 5G channel (with the J Block)

