



July 3, 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

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 July 2, 2019, Ted Carlson (Chairman of U.S. Cellular), Joe Hanley (Sr. VP – Telephone & Data Systems, Inc.) along with the undersigned met with Commissioner Carr and his wireless legal advisor Will Adams. U.S. Cellular stressed its commitment to serving rural areas. 63% of U.S. Cellular customers live in RSAs whereas nationally, only 23% of Americans live in RSAs.

During the course of the meetings we discussed the attached presentation regarding EBS spectrum. As part of those discussions, 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 attached presentation. 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. Carriers interested in deploying a 100 MHz data channel can still acquire that amount of contiguous spectrum in the EBS auction or can establish it through the use of carrier aggregation across EBS and other mid-band spectrum including C Band and CBRS.

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. When comparing 2.5 GHz to CBRS, 169% more cell sites

would be required using CBRS.

U.S. Cellular noted that although multiple licensees in a given market will marginally increase the need for border coordination efforts, virtually all wireless carriers already engage in those efforts on a daily basis and that such concerns were trivial when compared to the many benefits which will accrue to consumers from increased market competition among multiple providers of 5G services. Multiple winners of EBS in a given geographic area will also stimulate a race to deploy new networks faster than would otherwise occur in the absence of competition. In addition, incumbent PSA-based holders of EBS licenses who in the future decide to sell such spectrum in secondary market transaction will benefit greatly from the existence of multiple operators in a given market who can be potential purchasers, as opposed to a “winner take all” configuration where there can only be one logical purchaser.

Under our proposal, it is possible for multiple carriers to amass significant amounts of 2.5 GHz spectrum. For instance U.S. Cellular could win 33 MHz + 33 MHz while Sprint could capture the remaining 34 MHz + 16.5 MHz plus utilize their existing BRS spectrum.

Most importantly, we urged Commissioner Carr to look beyond a singular focus on theoretical efficiency resulting from the creation of a “single winner”, and to consider the benefits resulting from having stronger participation from small and regional providers in the auction room and thereafter in rural markets across America.

Sincerely,

/S/

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

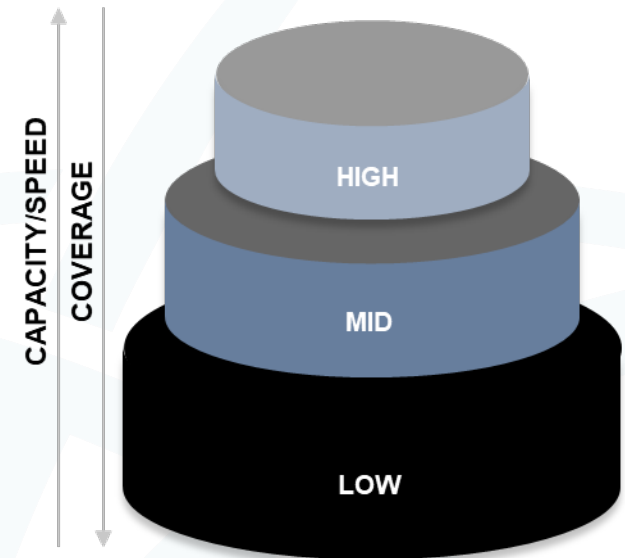


Mid-Band Spectrum Policy Transforming the 2.5 GHz Band

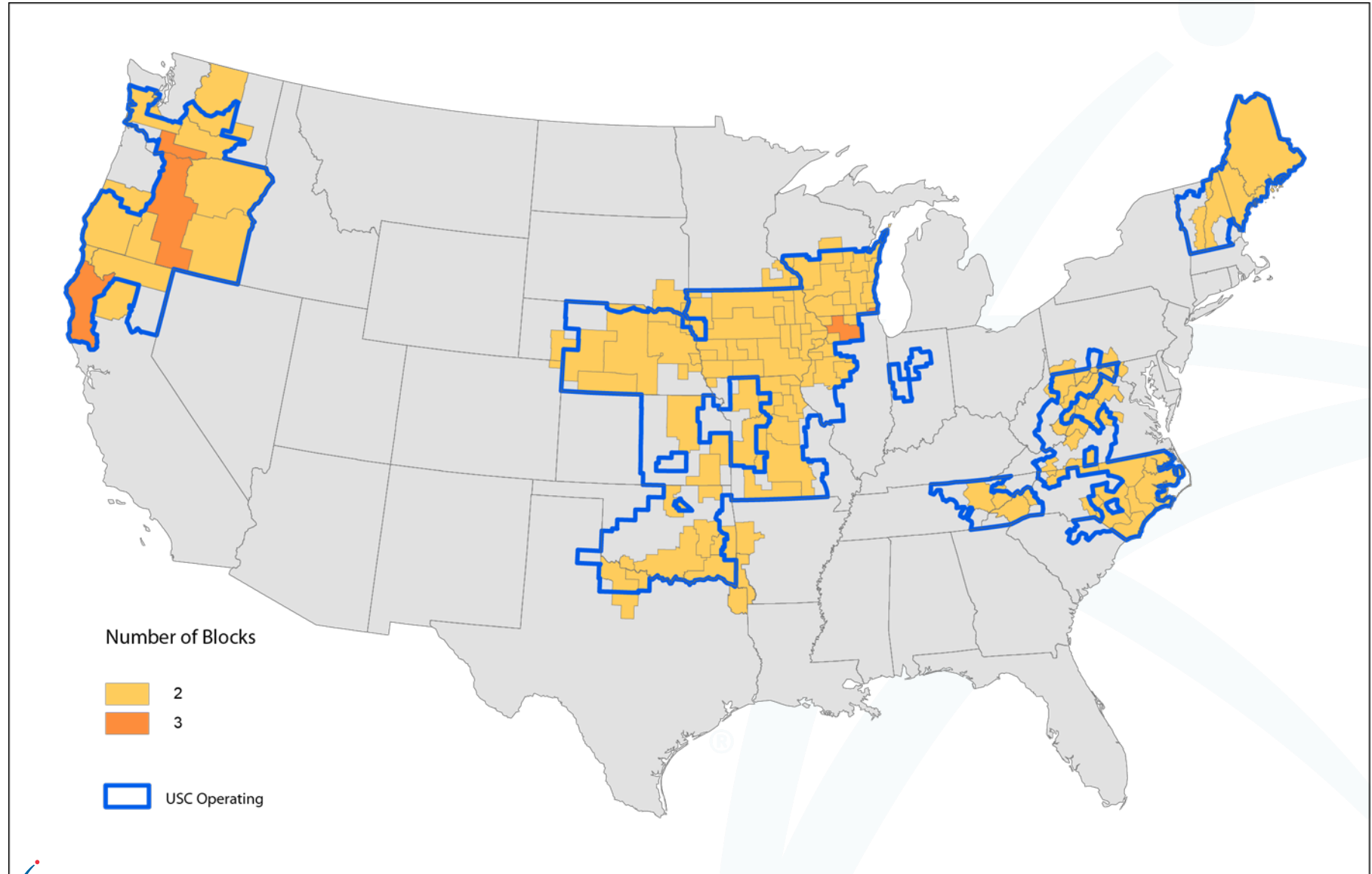
®

U.S. Cellular Plans for 5G

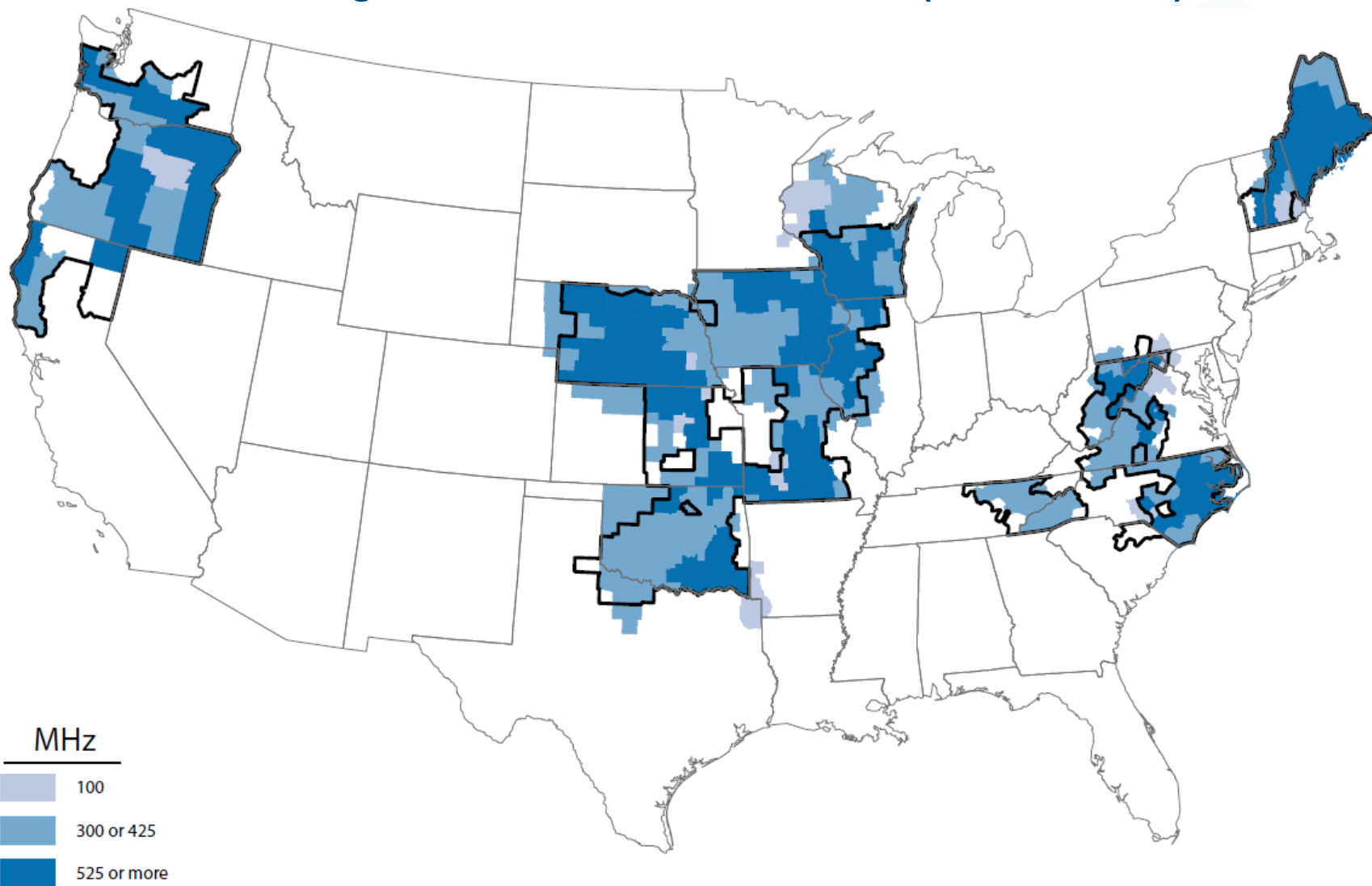
- U.S. Cellular is actively preparing to launch 5G service
- 6th Largest Purchaser of 600 MHz Spectrum
- 2nd Largest Purchaser of 28 GHz Spectrum in Auction 101
- 3rd Largest Purchaser of 24 GHz Spectrum in Auction 102
- Significant need for Mid-Band Spectrum to complete 5G deployment



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)

