



July 28, 2017

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Notice of ex parte presentation – Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz (GN Docket No. 17-183); Mobility Fund (WT Docket No. 10-208; WC Docket No. 10-90); Modernizing the FCC Form 477 Data Program (WC Docket No. 11-10)

Dear Ms. Dortch:

On July 26th and 27th, 2017, Scott Bergmann and Matthew Gerst of CTIA met with Commission staff from the office of Chairman Ajit Pai, Commissioner Mignon Clyburn, and Commissioner Michael O'Rielly to discuss CTIA's support for the FCC's proposed Notice of Inquiry examining potential mobile, terrestrial use of spectrum between 3.7 GHz–24 GHz (Mid-Band Spectrum NOI) and Mobility Fund Phase II Challenge Process Order (Mobility Fund II Challenge Process Order), as well as the proposed Form 477 Further Notice of Proposed Rulemaking (Form 477 FNPRM). See Appendix A for detailed list of attendees and topics covered.

In these meetings, CTIA expressed strong support for the Mid-Band Spectrum NOI and commended the Commission's recognition of the need to bring additional mid-band spectrum to market. CTIA also complemented recent Commission efforts to address low- and high-band spectrum and its specific focus on the 3.7-4.2 GHz and 6 GHz bands. CTIA welcomed the Mid-Band Spectrum NOI's invitation for comment on additional spectrum bands up to 24 GHz, thereby enabling the Commission to lay a strong foundation for future spectrum proceedings.

CTIA also expressed support for the overall framework of the Mobility Fund II Challenge Process Order that largely adopts CTIA's proposal for a new collection of mobile wireless coverage data specifically tailored for Mobility Fund II purposes to identify rural areas



that should be eligible for Mobility Fund II support.<sup>1</sup> Specifically, CTIA believes that the draft Mobility Fund II Challenge Process Order's proposal to collect new mobile wireless coverage data through consistent parameters will help to close the digital divide by ensuring that finite Mobility Fund II resources are targeted to truly unserved rural areas. To the extent the Mobility Fund II Challenge Process Order leaves issues for further consideration, CTIA encouraged the Commission to ensure such issues are resolved quickly so the Mobility Fund II reverse auction can be completed next year.

When discussing the Form 477 FNPRM, CTIA noted that Form 477 data has proven valuable to help assess the status of the market, but CTIA also agrees with the FCC's proposal to seek comment on ways to improve the Form 477 data collection process, particularly as applied to mobile wireless services. While the FCC evaluates refinements, CTIA encouraged the Commission to make clear that it continues to support previous findings based on the Form 477 data and align the Form 477 data reform with timing of the Mobility Fund II Challenge Process data collection. The FCC may learn lessons in the Mobility Fund II one-time data collection that may be relevant to a new Form 477 process.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/ Matthew Gerst

Matthew B. Gerst  
Assistant Vice President, Regulatory Affairs

cc Claude Aiken  
Amy Bender  
Rachel Bender  
Nick Degani  
Daudeline Meme  
Jay Schwarz

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<sup>1</sup> See Comments and Petition for Reconsideration of CTIA, WC Docket Nos. 10-90, 10-208 (filed April 26, 2017).



## APPENDIX A

July 26, 2017 Meeting with Office of Commissioner Clyburn (Form 477 FNPRM)

- Claude Aiken
- Jeremy Greenberg

July 26, 2017 Meeting with Office of Commissioner Clyburn (Mid-Band Spectrum NOI, Mobility Fund II Challenge Process Order)

- Claude Aiken
- Jeremy Greenberg

July 26, 2017 Meeting with Office of Commissioner O'Rielly (Mobility Fund II Challenge Process Order, Form 477 FNPRM)

- Amy Bender

July 27, 2017 Meeting with Office of Chairman Pai (Mid-Band Spectrum NOI, Mobility Fund II Challenge Process Order, Form 477 FNPRM)

- Nick Degani
- Rachel Bender
- Jay Schwarz