



July 29, 2019

*By ECFS*

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

**Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122**

Dear Ms. Dortch:

On July 26, 2019, Ross J. Lieberman, ACA Connects – America’s Communications Association (“ACA Connects”); Alexi Maltas and Courtney Neville, Competitive Carriers Association (“CCA”); Elizabeth Andrion (via teleconference) and Colleen King, Charter Communications, Inc. (“Charter”); Howard Symons, Jenner & Block on behalf of Charter; and Nikos Andrikogiannopoulos and Tunde Ibiyemi (via teleconference) of Cartesian Inc., met with representatives of the Federal Communications Commission’s (“FCC” or “Commission”) Wireless Telecommunications Bureau, International Bureau, Office of Economics and Analytics, and Office of Engineering and Technology, regarding the above-referenced proceeding. A full list of meeting participants is below.

At the meeting, our coalition of competitive and rural cable and wireless companies reiterated that mid-band spectrum is vital to unleashing the power and promise of 5G, and how it is reallocated will have significant impact on our nation’s wireless and broadband future. We discussed our “5G Plus” solution<sup>1</sup> to win the global 5G race. Specifically, we explained that the 5G Plus plan (1) makes available more critical 5G spectrum faster than other current proposals, (2) protects and future-proofs the delivery of pay television programming by transitioning it to fiber delivery, (3) uses auction proceeds to pay for that fiber use and deployment and other purposes to make whole incumbents (including satellite companies), (4) contributes billions of

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<sup>1</sup> See Letter from Ross Lieberman, ACA Connects – America’s Communications Association, Alexi Maltas, Competitive Carriers Association, and Elizabeth Andrion, Charter Communications, Inc., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (July 2, 2019).

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dollars to the U.S. Treasury, and (5) increases broadband deployment by building fiber – including in rural areas.

ACA Connects also discussed the study it commissioned and previously filed with the FCC, illustrating that at least 370 megahertz of C-band spectrum can be cleared in an expedited timeframe for use by next generation wireless services while making whole and incentivizing stakeholders and benefiting the public.<sup>2</sup>

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<sup>2</sup> See Letter from Ross Lieberman, ACA Connects – America’s Communications Association, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (July 15, 2019).

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Respectfully submitted,

/s/  
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cc (via email):

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**Office of Economics & Analytics**

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**Office of Engineering & Technology**

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\*indicates participant joined via teleconference