



August 13, 2018

VIA ELECTRONIC FILING

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

Re: Ex Parte Presentation, *Promoting Investment in the 3550-3700 MHz Band*
GN Docket No. 17-258

Dear Ms. Dortch,

On August 9, 2018, Scott Bergmann and Kara Graves of CTIA met with Erin McGrath of the office of Commissioner Michael O’Rielly to discuss the above-captioned proceeding. During the meeting, CTIA expressed its continued support for the Commission finalizing rules for the 3.5 GHz Citizen’s Broadband Radio Service (“CBRS”) to promote investment in the band.¹ Nations across the globe are pressing forward with the development of next-generation wireless, and mid-band spectrum is a key element of their plans for success. In the United States, the 3.5 GHz band is the mid-band spectrum that will become available in the near term, thus it is more important than ever for the Commission to finalize rules for the band to keep the United States competitive in the global race to 5G.

In particular, CTIA urged the Commission to adopt a reasonable geographic area size for Priority Access Licenses (“PALs”). As CTIA has highlighted in the record, the current licensing scheme for the CBRS, with 74,000 separate license areas based on census tracts and an average population of 4,400 per area, is significantly smaller than the license areas used for comparable spectrum in the rest of the world.² Moreover, census tract licensing would have significant drawbacks, including that it would

¹ See *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking, 32 FCC Rcd 8071 (2017).

² See David Abecassis, et al., *Mid-band spectrum geographical licensing approaches*, ANALYSYS MASON (July 2018), <https://api.ctia.org/wp-content/uploads/2018/07/Analysys-Mason-mid-band-5G-spectrum-paper-7-03-18.pdf>,



create administrative complexity for the Commission, licensees, and Spectrum Access System Administrators; raise significant interference concerns; reduce the value of the spectrum; and raise the cost of designing and deploying networks, thereby harming rural investment.³ And, importantly, an auction that includes census tract licensing—be it for all 70 megahertz of licensed spectrum in the 3.5 GHz band or only a portion—will necessarily result in delayed deployment. All of these factors suggest that the use of census tract licensing would significantly harm the ability of U.S. providers to harness the value of this limited licensed mid-band spectrum. CTIA therefore urged that any geographic area license compromise not include census tracts as part of that equation.

Also during the meeting, CTIA urged the Commission to modify the PAL term to a standard, ten-year term with an expectation of renewal—which would give licensees greater certainty and encourage investment.⁴ CTIA also encouraged the Commission to adopt its proposal to eliminate the public disclosure rule for Citizens Broadband Radio Service Device registration information, a requirement that creates unnecessary risks to security and sensitive business information without any countervailing benefits that would offset these harms.⁵

Making these targeted reforms to the CBRS license framework will help unlock the benefits that 5G will bring to the U.S. economy—benefits that were not foreseen when this proceeding was originally undertaken—by providing faster speeds and additional bandwidth needed to support the Internet of Things.⁶ And the Commission can move forward with these proposals without delaying access to the 3.5 GHz band or undermining General Authorized Access (“GAA”) use. Instead, these targeted changes

attached to Letter from Scott K. Bergmann, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 17-258, 17-183, 18-122 (filed July 9, 2018).

³ See, e.g., Letter from Scott K. Bergmann, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-258 (filed June 15, 2018).

⁴ See Letter from Scott K. Bergmann, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 17-258, at 3-4 (filed July 2, 2018).

⁵ *Id.* at 6-8.

⁶ See *Smart Cities: How 5G Can Help Municipalities Become Vibrant Smart Cities*, ACCENTURE STRATEGY (Jan. 2017), <https://www.ctia.org/docs/default-source/default-document-library/how-5g-can-help-municipalities-become-vibrant-smart-cities-accenture.pdf>; see also *Wireless Connectivity Fuels Industry Growth and Innovation in Energy, Health, Public Safety, and Transportation*, DELOITTE (Jan. 2017), <https://www.ctia.org/news/deloitte-wireless-connectivity-fuels-industry-growth-and-innovation>.



would improve the novel three-tier framework by increasing incentives for investment in PALs and the band as a whole, without affecting GAA access to the CBRS band or changing the flexible nature of the CBRS framework.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission participant. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Kara R. Graves

Kara R. Graves
Director, Regulatory Affairs

cc: Erin McGrath