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Marlene H. Dortch Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20510

Brian Hendricks
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Re: *Notice of Ex Parte Presentation*, GN Docket Nos. 14-177, 15-319, 17-183, 17-258; 18-122;
IB Docket Nos. 97-95, 15-256; WC Docket No. 18-89; WT Docket Nos. 10-112, 17-79

Dear Ms. Dortch:

Brian Hendricks and Jeffrey Marks, of Nokia, met with the following Commissioners' offices in separate meetings:

- On August 28, 2018, (1) Commissioner Michael O'Rielly and his Legal Advisor, Erin McGrath; and (2) Commissioner Jessica Rosenworcel and her Interim Legal Advisor, Elizabeth McIntyre;
- On August 29, 2018, Will Adams, Legal Advisor to Commissioner Brendan Carr (by telephone with Mr. Marks only); and
- On August 30, 2018, Michael Carowitz, Special Counsel to Chairman Ajit Pai (with Mr. Marks in person and Mr. Hendricks by telephone).

In each of these meetings, the Nokia representatives stressed that the Commission should consider emerging headwinds, that are mostly external to Commission jurisdiction, that nevertheless threaten to impede 5G roll-out. These headwinds make the Commission's policy choices in the areas in which it has authority (such as siting reform and spectrum) take on even greater significance.

Of particular concern to Nokia are the recent tariffs imposed on trade with China, which specifically target a wide range of components that are critical to 5G. Unless exemptions are provided for these products, these latest duties threaten to raise the cost of 5G infrastructure in the U.S. by hundreds of millions of dollars. This is an important context that further emphasizes

the need for the Commission to lower barriers to deployment where it can. Nokia also referenced its submission in the Commission's Universal Service Supply Chain proceeding, which responded to a number of absurd claims made by Huawei about its own operations and the operations of Nokia in China.

Nokia thanked the Commissioners and staff for the Commission's robust spectrum pipeline, especially in mmWave bands, and discussed the need for the Commission to act quickly with respect to the 3.7-4.2 GHz band. We reiterated our advocacy that the current proposal by the incumbent Fixed Satellite Service (FSS) providers (Intelsat, SES and Eutelsat) to free only 100 MHz for 5G service is not acceptable. We noted, however, that we are hopeful that the FSS operators will listen to Commissioner O'Rielly's and others' public calls to clear a more substantial portion of the band. Nokia stated that it would be highly beneficial for these FSS providers to augment the record as early as possible with an updated proposal laying out the parameters of how much spectrum they plan to make available, and when.

Nokia has consistently advocated that the Commission authorize a private sale of the 3.7 GHz band, rather than a public auction process, due to the critical need to convert this spectrum to 5G use quickly. As we previously noted in the proceeding, China, Japan, and South Korea have advanced plans currently being executed to place substantial amounts of mid-band spectrum into the hands of operators for 5G deployments this year and early next year. In contrast, in the U.S., the current list of public auctions already in the Commission's queue would mean that a public auction for the 3.7 band would likely not occur until (at least) 2020 and possibly later as the rest of the world moves forward at a much faster pace.

Despite the critical need for speed to market, Nokia cannot support a private sale that only would yield 100 MHz for 5G. We suggested the Commission carry forward with its NPRM with the goal of ensuring timely access to at least 250-300 MHz of the band. If the FSS providers are not prepared to voluntarily clear and make this amount of spectrum available via secondary market agreements, the Commission should consider mandating the higher amount via public auction, with a very high priority. We also reiterated our opposition to the granting of petitions for point-to-multipoint activity in this band, which would make repurposing of the band for 5G mobility needlessly, and possibly insurmountably, difficult.

With respect to the 3.5 GHz band, Nokia discussed the advanced ecosystem that has developed to support initial commercial deployments of General Authorized Access (GAA) service *this year*. We urged an expedited process for grant of proposals submitted by the September 10, 2018 deadline so that deployment in this ecosystem is not further delayed. While Priority Access License auctions likely cannot occur until late 2019 or 2020, GAA does not require an auction for deployment to commence. The Commission should recognize the importance of launching GAA as soon as possible to jump-start innovative deployments in this valuable mid-band spectrum range.¹

¹ In these meetings, Nokia also offered observations regarding the proposed merger of T-Mobile and Sprint, which are reflected in a separate ex parte letter submitted in WT Docket No. 18-197.

Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

/s/ Brian Hendricks

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cc: Commissioner Michael O’Rielly
Erin McGrath, Legal Advisor to Commissioner O’Rielly
Commissioner Jessica Rosenworcel
Elizabeth McIntyre, Interim Legal Advisor to Commissioner Rosenworcel
Will Adams, Legal Advisor to Commissioner Brendan Carr
Michael Carowitz, Special Counsel to Chairman Ajit Pai