



September 9, 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 September 5, 2019, Ross J. Lieberman and Brian Hurley, ACA Connects – America’s Communications Association (“ACA Connects”); Alexi Maltas and Courtney Neville, Competitive Carriers Association (“CCA”); Elizabeth Andrion and Colleen King, Charter Communications, Inc. (“Charter”); and Johanna Thomas of Jenner & Block, counsel to Charter, met, in separate meetings, with Umair Javed, Legal Advisor, Wireless and International to Commissioner Jessica Rosenworcel; William Davenport, Chief of Staff to Commissioner Geoffrey Starks, and Will Adams, Legal Advisor to Commissioner Brendan Carr, regarding the above-referenced proceeding.

In the meetings, 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 underscored that how this spectrum is reallocated will have significant impact on our nation’s wireless and broadband future. We explained that our “5G Plus Plan”¹ increases broadband deployment by deploying substantial amounts of fiber throughout the country, including in rural areas. We also discussed how the 5G Plus plan (1) makes available more critical 5G spectrum faster than other current proposals; (2) future-proofs the delivery of enhanced pay television programming (including 8K) by transitioning it to fiber delivery; (3) uses auction proceeds to pay for that fiber use and deployment and makes whole incumbents (including satellite companies); and (4) contributes billions of dollars to the U.S. Treasury.

Participants in the meetings praised the Commission for its focus on closing the digital divide and all its efforts to address this matter. We emphasized that the 5G Plus Plan would advance the Commission’s objectives in this area by investing billions of dollars to deploy 120,000 new route

¹ 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).

miles of fiber with a capacity to deliver 10 Gbps broadband service to homes and businesses. All of this new fiber will be deployed in areas where there is no fiber, or no redundant fiber. This infrastructure and increased fiber capacity is critical to support accelerated deployment of 5G small cells, increased Internet reliability, and ultra-fast broadband benefits including enablement of smart grid and smart metering applications. Importantly, it provides an economically viable solution to providing access to high-speed broadband to some underserved locations including those in rural areas.

ACA Connects also discussed the study that 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 deploying fiber, making whole and incentivizing stakeholders, and benefiting the public.² In addition, ACA Connects indicated that it plans soon to file a supplement to this study, in which it will lay out in more detail how the fiber network would be designed, established, launched, maintained, and paid for, particularly the part of the network that connects programmers to data centers.

Respectfully submitted,

/s/

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² 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).