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September 20, 2019

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

Re: ***Competitive Bidding Procedures for Auction 105  
AU Docket No. 19-244***

***Wireless Telecommunications Bureau Seeks Comment on Wireless Internet  
Service Providers Association and Utilities Technology Council Request for  
Waiver of the Citizens Broadband Radio Service Transition Deadline  
WT Docket No. 18-353***

***Notice of Ex Parte Communication***

Dear Ms. Dortch:

On September 19, 2019, on behalf of the Wireless Internet Service Providers Association (“WISPA”), the undersigned and its outside counsel Stephen Coran met with: (1) Aaron Goldberger, Legal Advisor to Chairman Ajit Pai; (2) Margaret Wiener, Martha Stancill, Craig Bomberger, Jonathan Campbell and Mary Lovejoy of the Office of Economics and Analytics; and (3) Becky Schwartz and Jessica Quinley of the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss the draft Public Notice proposing procedures for the auction of Priority Access Licenses in the 3550-3700 MHz band.<sup>1</sup> In a separate meeting with Mr. Goldberger, Mr. Campbell, Ms. Schwartz and Ms. Quinley, we discussed the status of the joint request for waiver of the Part 96 transition rules filed by WISPA and the Utilities Technology Council (“Waiver Request”).<sup>2</sup>

With respect to the *Draft PN*, we expressed WISPA’s desire to ensure that the auction rules afford bidders a fair opportunity to bid on and acquire rural counties. We indicated that WISPA would be an active participant in the proceeding. Finally, we asked that the Commission include a sentence at the end of paragraph 32 asking what alternative proposals the Commission

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<sup>1</sup> Public Notice, *Auction of Priority Access Licenses for the 3550-3700 MHz Band; Comment Sought on Competitive Bidding for Auction 105; Bidding in Auction 105 Scheduled to Begin June 25, 2019*, FCC-CIRC1901-01, AU Docket No. 19-244 (Sept. 5, 2019) (“*Draft PN*”).

<sup>2</sup> Public Notice, *Wireless Telecommunications Bureau Seeks Comment on Wireless Internet Service Providers Association and Utilities Technology Council Request for Waiver of the Citizens Broadband Radio Service Transition Deadline*, DA 18-1206 (rel. Nov. 27, 2018).



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should consider to encourage robust bidding in rural counties and other counties with low populations.

With respect to the Waiver Request, we reiterated, consistent with WISPA's May 3, 2019 ex parte letter,<sup>3</sup> that the April 2020 transition deadline would not allow many WISPA members to complete the transition in time given delays in equipment certifications and the upcoming winter months that will make hardware change-outs more challenging, if not prohibitive, in many areas of the country. We asked that the Commission act quickly to grant the Waiver Request.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in above-referenced dockets. Please contact the undersigned with any questions.

Respectfully submitted,

*/s/ Louis Peraertz*  
Louis Peraertz, Vice President of Policy

cc: Aaron Goldberger  
Margaret Wiener  
Martha Stancill  
Craig Bomberger  
Jonathan Campbell  
Mary Lovejoy  
Becky Schwartz  
Jessica Quinley.

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<sup>3</sup> Letter from Stephen E. Coran, Counsel to WISPA, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed May 3, 2019).