

September 20, 2019

**VIA ECFS**

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

**Re:** *Auction of Priority Access Licenses for the 3550-3650 MHz Band, AU Docket No. 19-244; Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258; Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122*

Dear Ms. Dortch,

On September 18, 2019, Colleen King and the undersigned of Charter Communications, Inc. (“Charter”), met with Umair Javed, advisor to Commissioner Rosenworcel regarding the above-captioned proceedings. On September 19, 2019, the undersigned, in separate meetings, also met with William Davenport, Chief of Staff and senior advisor to Commissioner Starks, and Joseph Calascione, advisor to Commissioner Carr.

During the meetings, Charter described its interest in using the 3550-3700 MHz (“3.5 GHz”) band for its broadband and voice services. It is currently testing a variety of new technologies for mobile and fixed wireless services using 3.5 GHz spectrum in several urban and rural markets across the country, including Tampa, Charlotte, Denver, Lexington, Los Angeles, and New York—with additional sites in the pipeline. With the information received from these trials, Charter will evaluate the use of this band in conjunction with its existing infrastructure to deploy licensed small cells using 4G LTE and 5G wireless access technologies to enhance its wireless products.

Charter also expressed its appreciation to the Commission for establishing county-based geographic licensing areas in the 3.5 GHz band in order to ensure fuller utilization of the band, including by rural and smaller bidders as well as new entrants. Charter asked the Commission to seek additional comment on the proposal for CMA-level bidding in the auction for this band. Specifically, Charter asked the Commission to seek comment on whether the Commission should limit the extent of CMA-level bidding, while still providing bidding flexibility for those

applicants interested in serving larger areas, by, for instance, excluding larger CMAs; excluding the largest counties in the top 30-50 largest Metropolitan Statistical Areas; limiting to less than four the number of Priority Access Licenses in a given county that can be included in a winning CMA-level bid; or by other means. Charter suggested that the Commission ask commenters to explain how these alternatives would help facilitate auction participation by bidders who seek licenses for individual counties.

Finally, Charter encouraged the Commission to move quickly to repurpose the 3.7-4.2 GHz band (or C-Band) by adopting a Commission-led auction approach. Charter discussed the various benefits of this open, fair, and transparent process, including that it will allow the Commission to use auction proceeds to expand rural broadband buildout across the country.

Respectfully submitted,

*/s/ Elizabeth Andrion*

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Elizabeth Andrion  
Senior Vice President, Regulatory Affairs

cc: Meeting attendees