



September 25, 2019

VIA ECFS

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

**Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122;
RM-11791; RM-11778**

Dear Ms. Dortch:

Ride Television, Inc. ("RIDE TV") writes to provide *ex parte* comments regarding the Commission's review of proposals to make some or all of the 3.7-4.2 GHz band (C-Band) available for terrestrial, flexible use.¹ While RIDE TV does not endorse any specific proposal under consideration by the Commission, RIDE TV believes that terrestrial delivery of video programming over fiber optic networks can offer at least as reliable transport to multichannel video programming distributors ("MVPDs") as satellite delivery via C-band spectrum.. Accordingly, RIDE TV has no objections to the reallocation of a significant amount of C-Band spectrum for terrestrial wireless use or to an expedited migration of its video programming transport to fiber, consistent with the 5G Plus Plan's supplemental filing, so long as the proposal meets the following criteria:

- Protection Against Unjust Enrichment – Spectrum is a public asset that should accrue public interest benefits in any reallocation proposal. Existing license holders should be entitled to some reallocation proceeds, but they should not be entitled to all reallocation profits.
- Transparency – Any proposal ultimately approved by the Commission must provide for an open and transparent process for the reassignment of wireless licenses. Current licensees should not be permitted to pick and choose winners and losers for the reassignment of spectrum licenses.
- Rural Broadband Development – A portion of the proceeds from any reallocation auction should be used to support rural broadband deployment. To this end, proposals that provide middle mile fiber that can be utilized for both video backhaul and broadband expansion is particularly attractive.

Respectfully submitted,

/s/

John B. Simpson
Consultant to RIDE TV

¹ Expanding Flexible Use of the 3.7-4.2 GHz Band, GN Docket No. 18-122, Order and Notice of Proposed Rulemaking, 33 FCC Rcd 6915 (2018) (Notice).