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September 26, 2018

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

**Re: Transforming the 2.5 GHz Band, WT Docket No. 18-120
Notice of Oral Ex Parte Communication**

On September 24, 2018, Nicole Tupman and the undersigned of Midcontinent Communications (Midco) met with the following individuals from the Wireless Telecommunications Bureau: Dana Shaffer, Deputy Bureau Chief; Jonathan Campbell, Legal Advisor to the Bureau Chief; Blaise Scinto, Chief of the Broadband Division; John Schauble, Deputy Chief of the Broadband Division; and Matthew Pearl, Catherine Schroeder, Nadja Sodos-Wallace, and Nancy Zaczek, of the bureau staff. Midco discussed the above-referenced proceeding, and Midco's experience with fixed wireless and desire to use the 2.5 GHz band to serve rural America and bridge the Digital Divide.

Midco shared its views on the 2.5 GHz band, as summarized in the enclosed presentation and maps, including the following: incumbent licenses should be rationalized from the current 35-mile radius government service areas (GSA) to county-sized licenses if the GSA covers at least 75% of the county; rationalization should be automatic and occur before a commercial auction; the Commission should create auction procedures to encourage rural broadband buildout; and the Commission should balance commercial use of the 2.5 GHz band with the original, educational purposes of the band by requiring participation in E-rate or a similar program. Midco also discussed whether the Commission should open a priority access window for rural Tribal Nations prior to a commercial auction.

Midco also discussed and endorsed the channel plan and associated spectrum limitation of no more than 63 MHz advanced by the Wireless Internet Service Provider Association (WISPA), specifically:

- A1-A3 and B1-B3 – 33 MHz of contiguous spectrum in lower band segment
- C1-C3 and D1-D3 – 33 MHz of contiguous spectrum in lower band segment
- A4, B4, C4, D4, and G4 – 30 MHz of contiguous spectrum in middle band segment
- G1-G3 – 16.5 MHz of contiguous spectrum in upper band segment

See WISPA Comments at p. 20; WISPA Reply Comments at p. 18.



In accordance with Section 1.1206(b) of the Commission's rules, I have filed a copy of this notice electronically in the above-referenced docket. Please address any questions regarding the foregoing to me.

Sincerely,

/s/

Scott B. Anderson
Chief Legal Officer

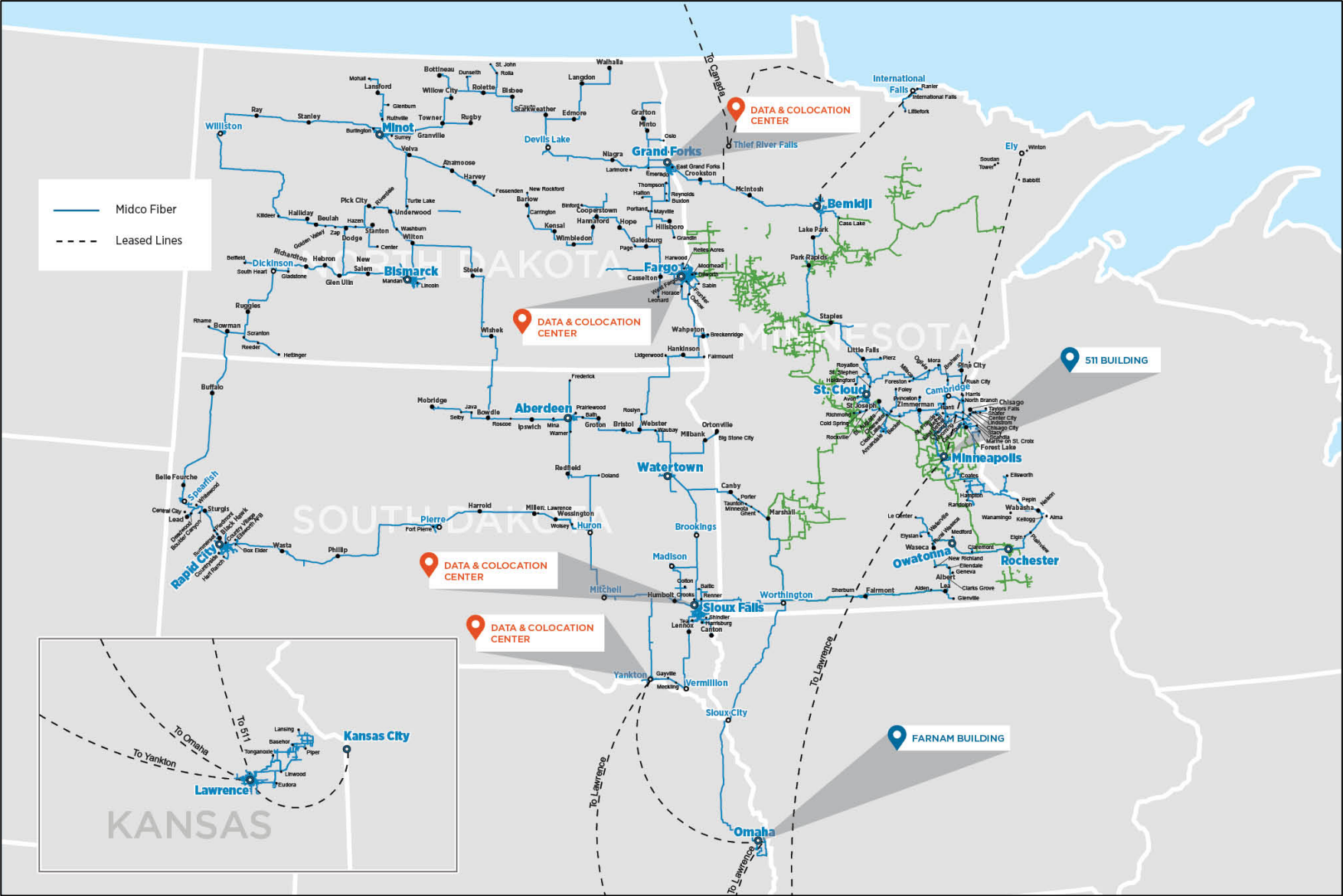
Enclosures

cc: Meeting participants

Using the 2.5 GHz Band to Serve Rural America



Midwestern Service



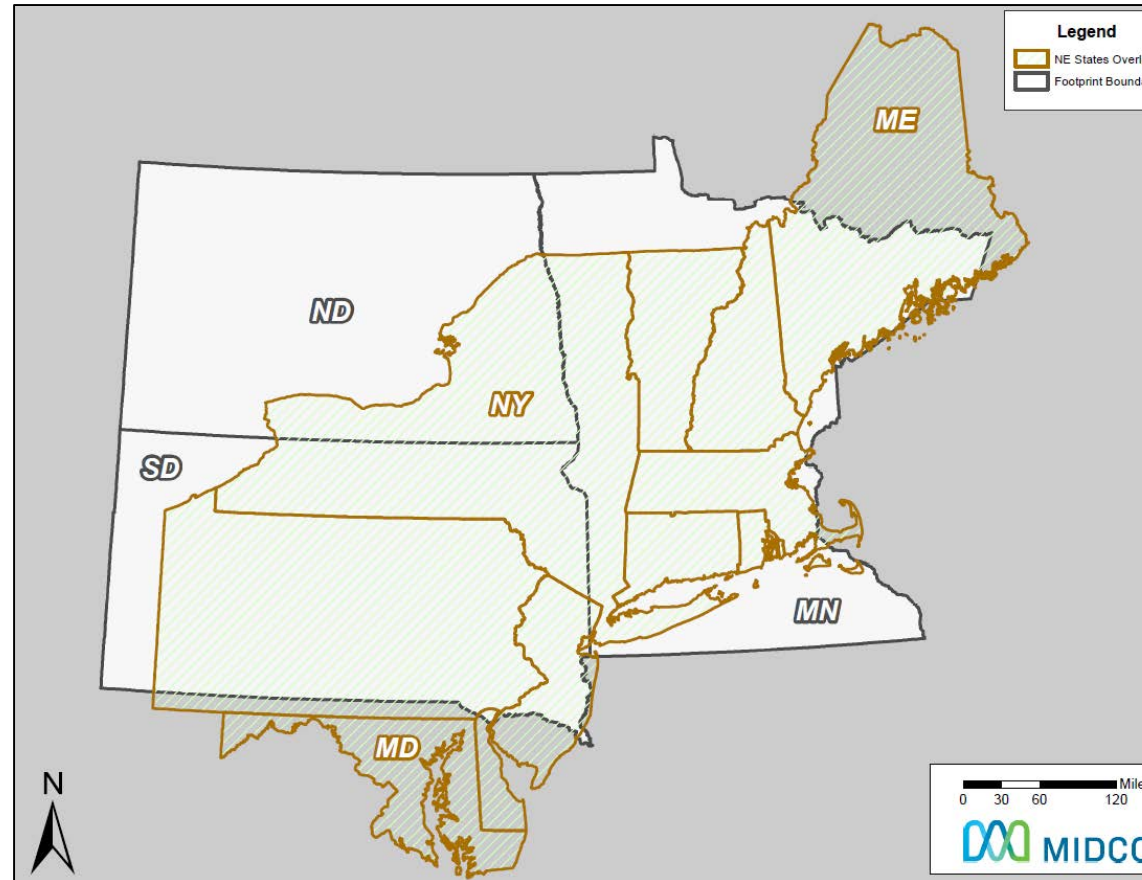
Multiple Services Operator

- 10,000 fiber miles; 4 owned data centers; 2 leased data centers
- 365,000+ wired broadband customers; 80% with Gigabit access
- 4,200+ fixed wireless broadband customers; 140 “towers”
- 70,300+ residential phone customers
- 17,600+ Hosted VoIP customers
- 290,700+ video customers
- 1,500+ Midco SmartHome customers
- Tri-state sports network, MidcoSN

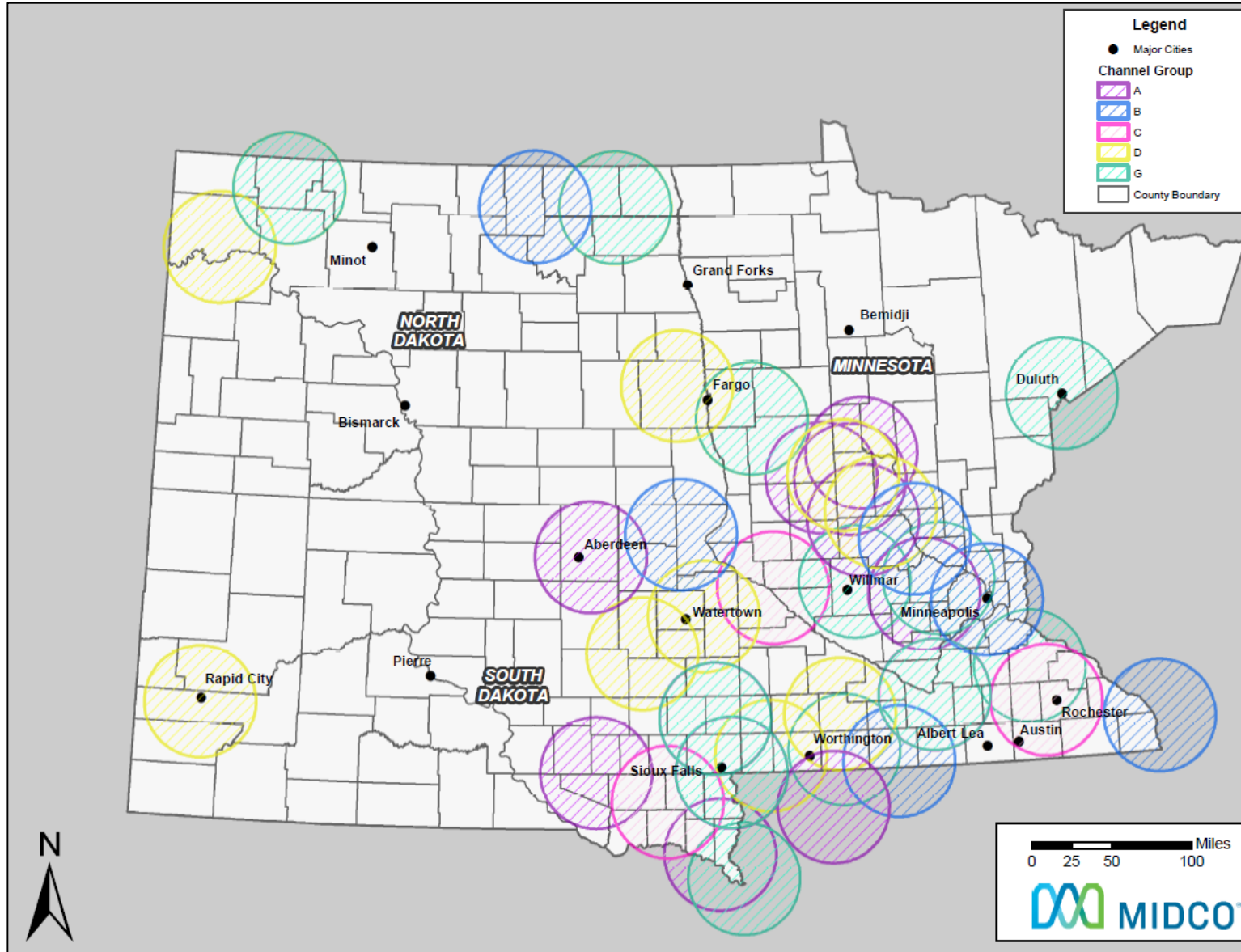


Providing Rural Connectivity

- Northeast population: approx. 61.2 million
- Midco footprint population: approx. 7.2 million



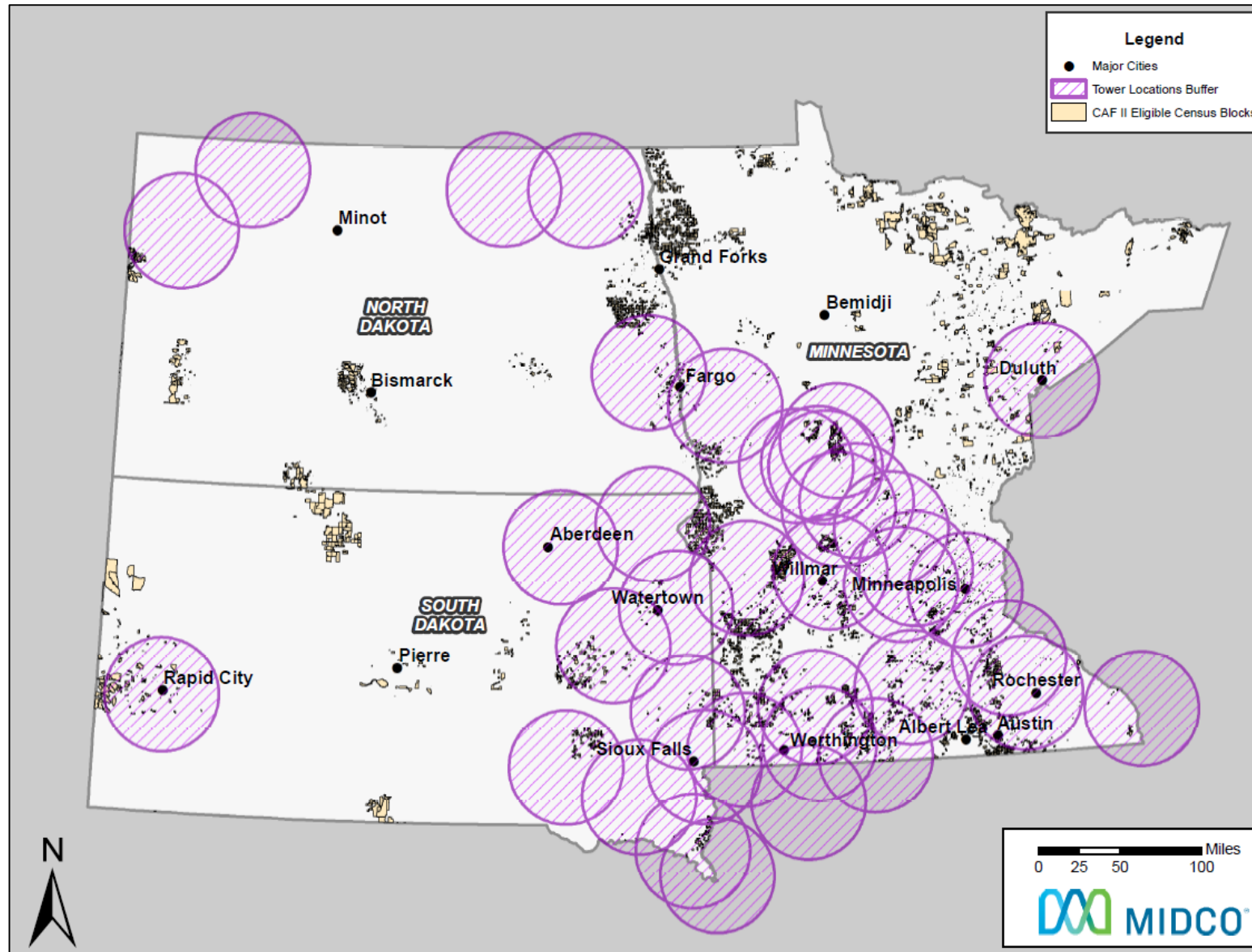
EBS Licenses in Footprint



Commercial EBS Use

- 98% of SD, ND, and MN licenses are essentially commercial
 - 102 licenses
 - 73 have a commercial lease
 - Only 6 of the 29 remaining GSAs have an educational licensee
 - 2 of those 6 are out-of-state, i.e., commercial, licensees
 - Another 2 of the 6 indicate recently expired leases
- 49% of leases associated with Sprint

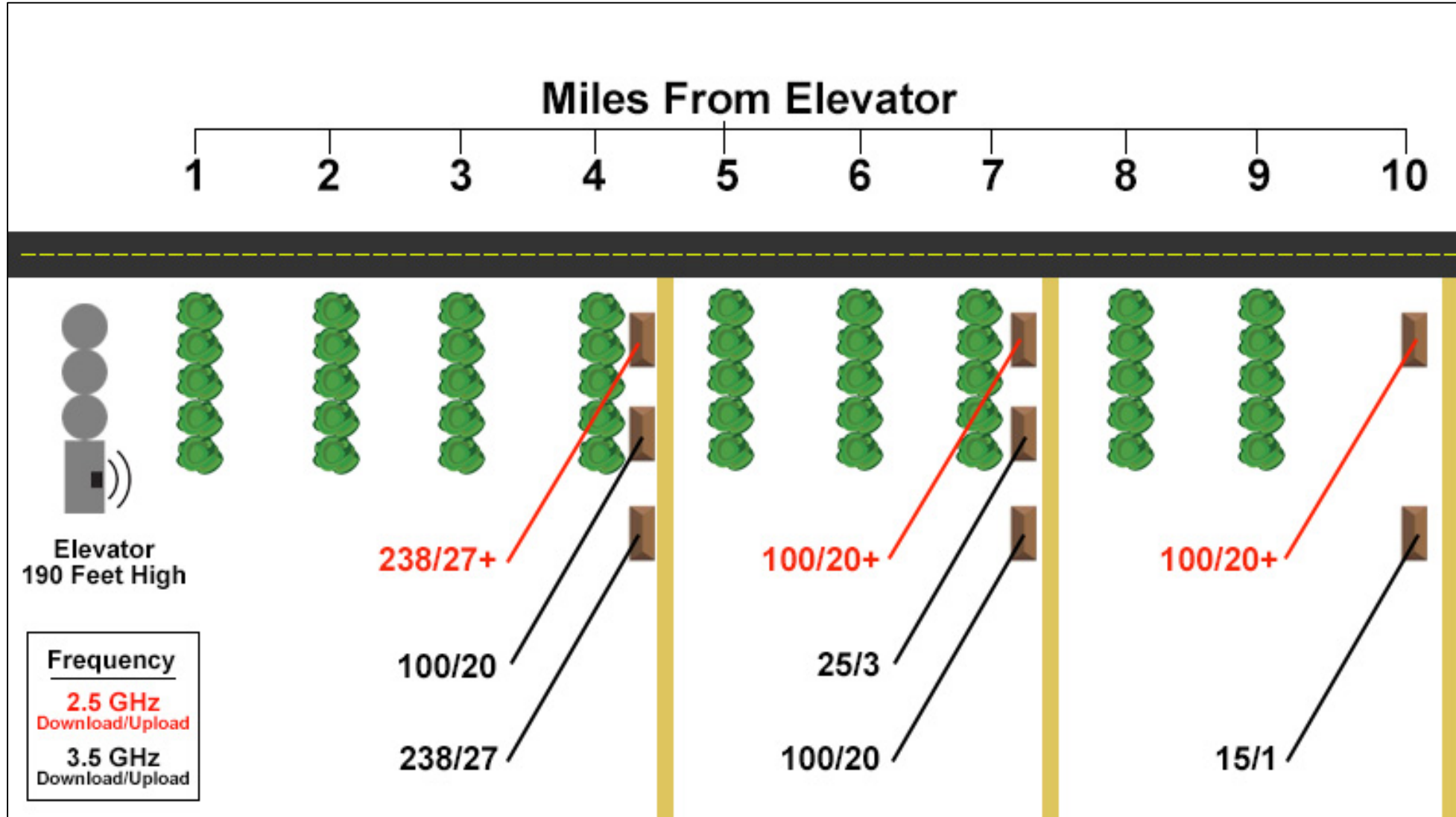
Even with Commercial Use, Still Unserved Areas



2.5 GHz is Valuable in Rural Areas

- About 1 watt of power allowed in 3.5 GHz;
but 10 watts in 2.5 GHz with carrier aggregation technology
- Good propagation characteristics for forests and shelter belts
- More opportunities to cover larger, less densely populated areas

3.5 GHz Band v. 2.5 GHz Band (40 MHz)



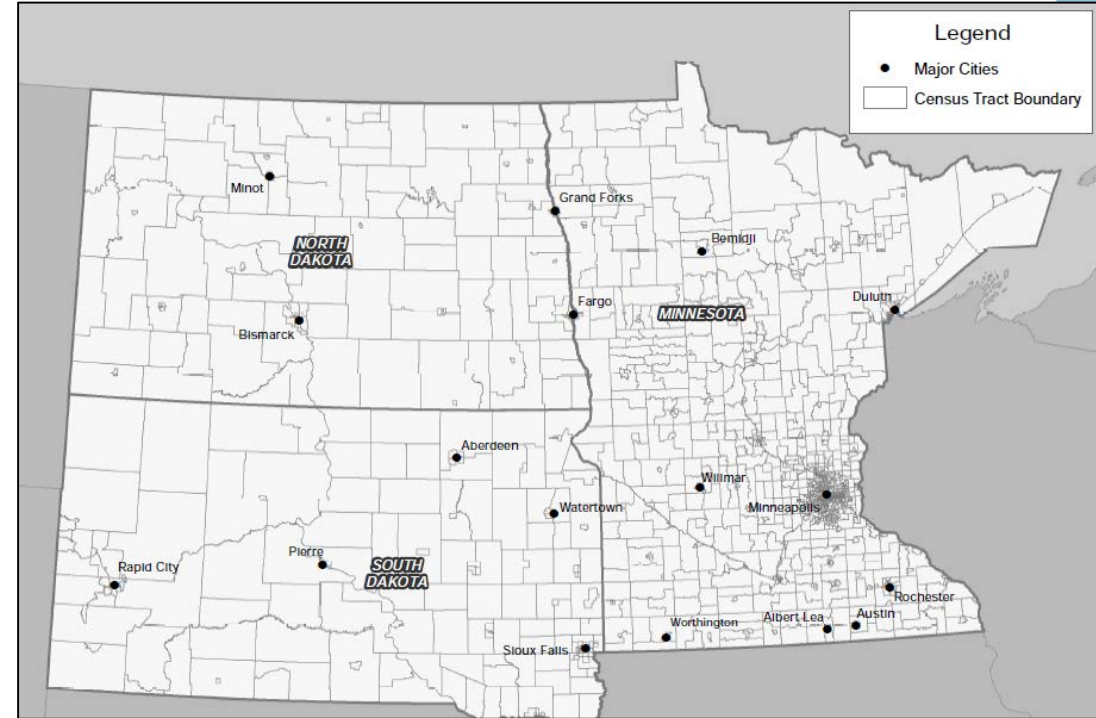
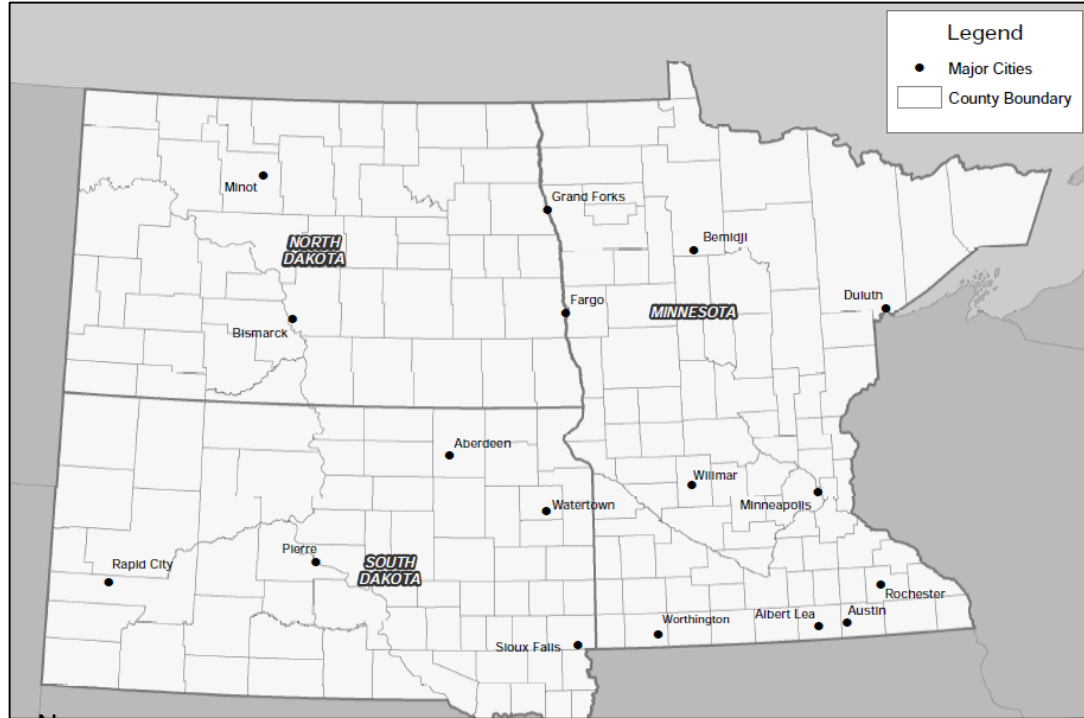
Maximizing the 2.5 GHz Band

- Ideally, 40 MHz of the 2.5 GHz band available to license
 - Consider similar rules for the BRS to increase available spectrum
- At least a 10 MHz channel is best for carrier aggregation
- Contiguous channels easier, but not necessary
- More spectrum equates to more bandwidth for rural Americans, rural businesses, smart agriculture

Connecting Rural Businesses



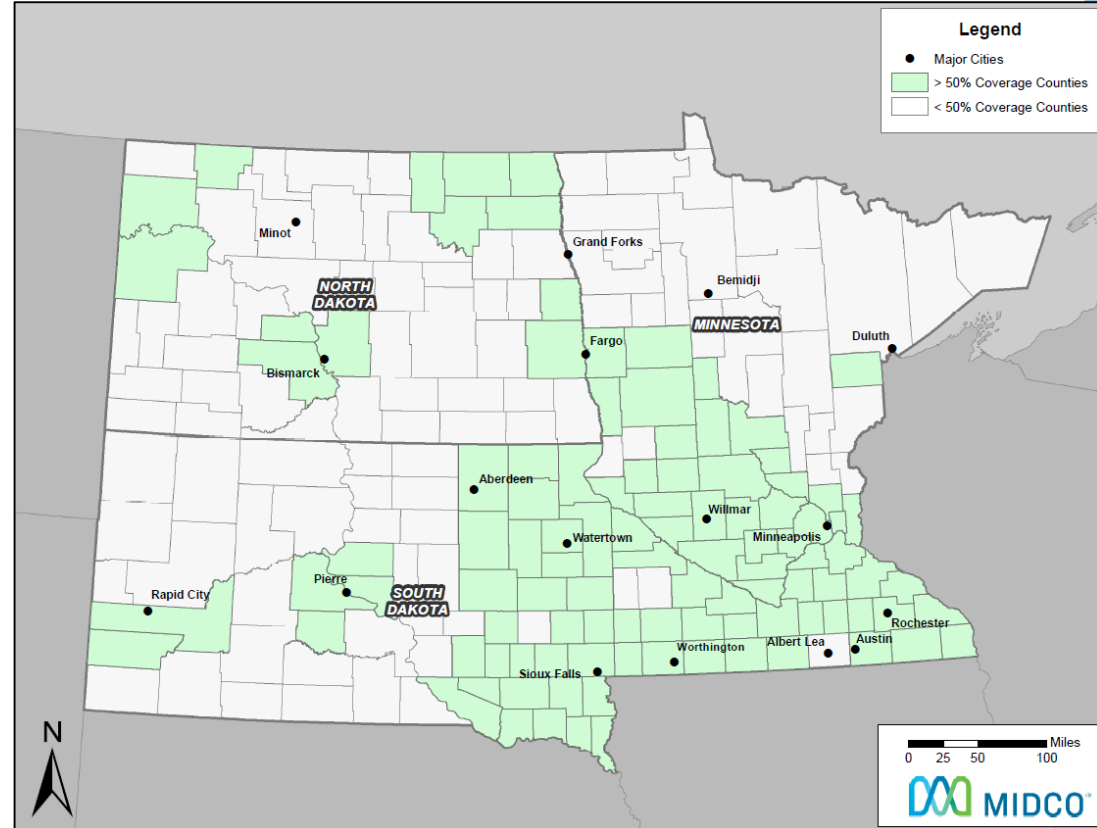
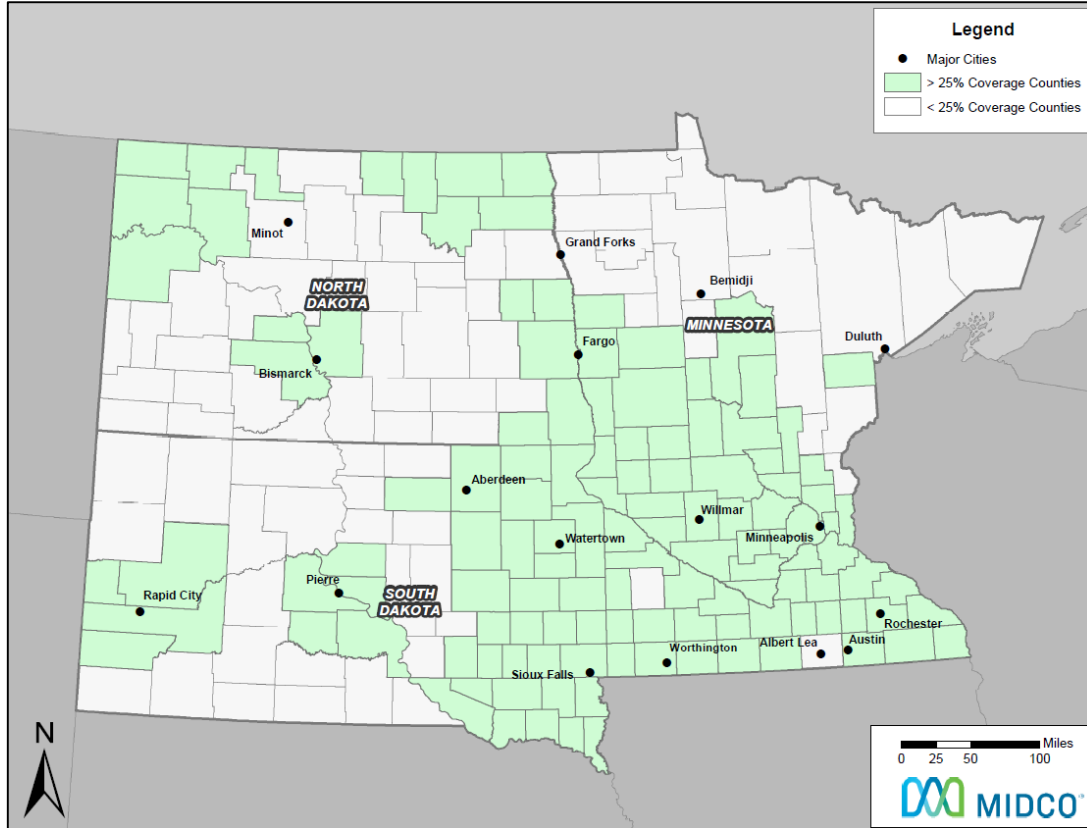
GSAs and New Licenses as County-Sized Licenses



Rationalization of GSAs

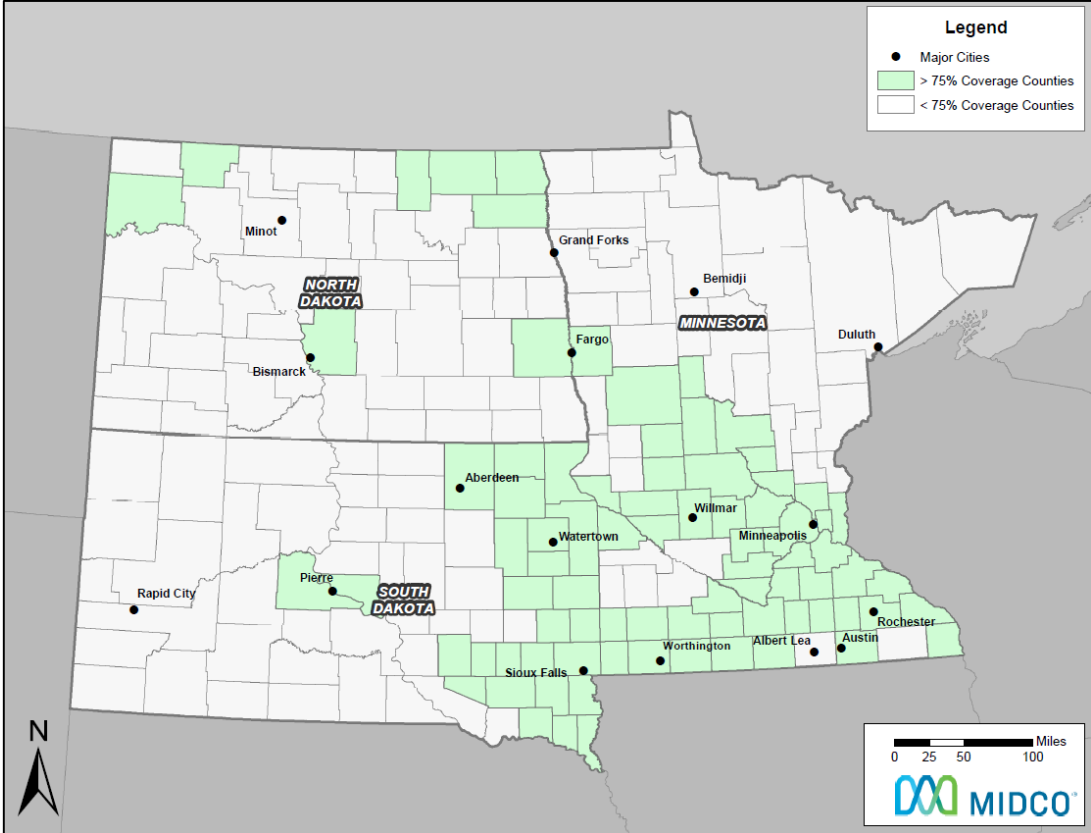
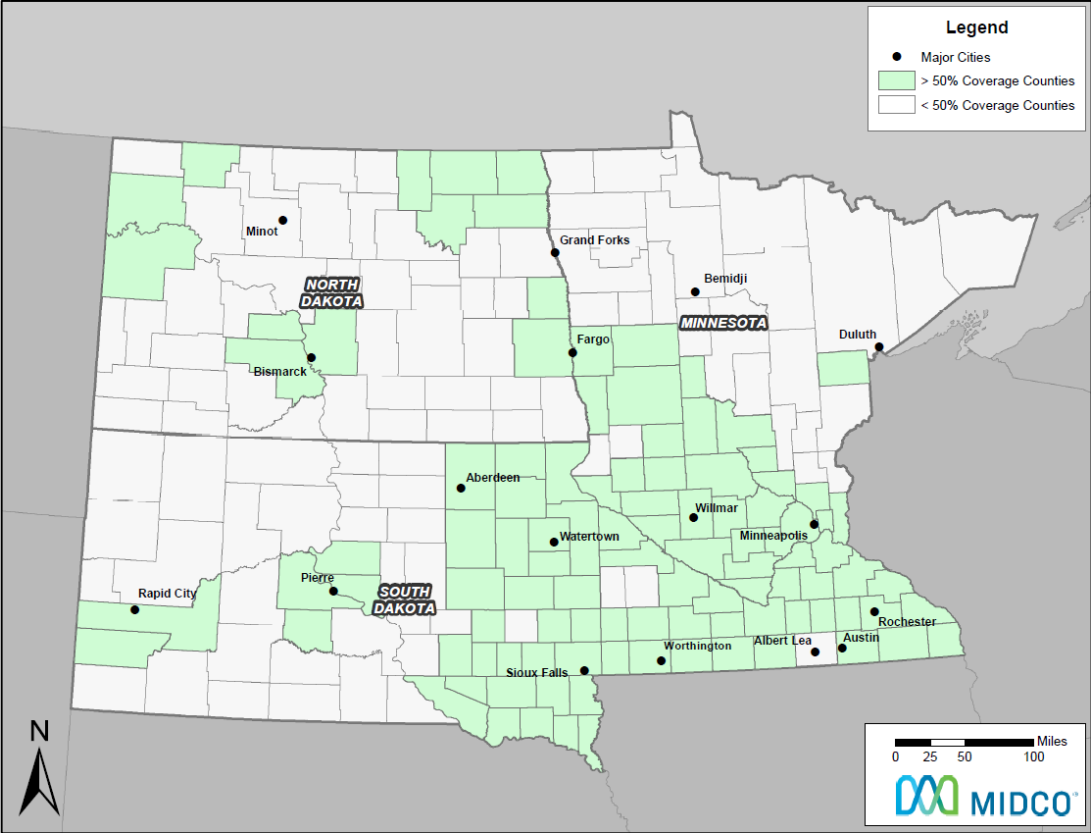
- Given the commercial nature and change of use in spectrum from broadcast to broadband, rationalization is fair
- Rationalize GSAs prior to commercial auction
- Automatic rationalization of GSAs to county-sized licenses if a minimum of 75% of GSA covers the county

Rationalization on 25% v. 50% of Geography



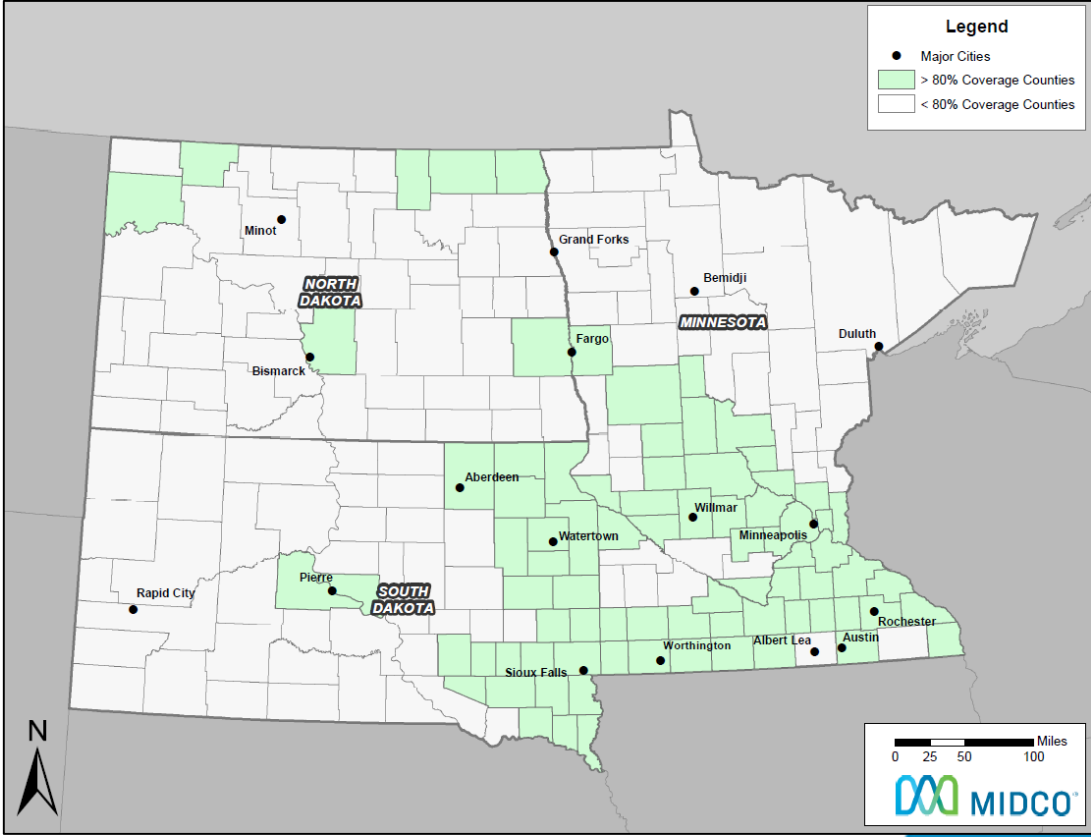
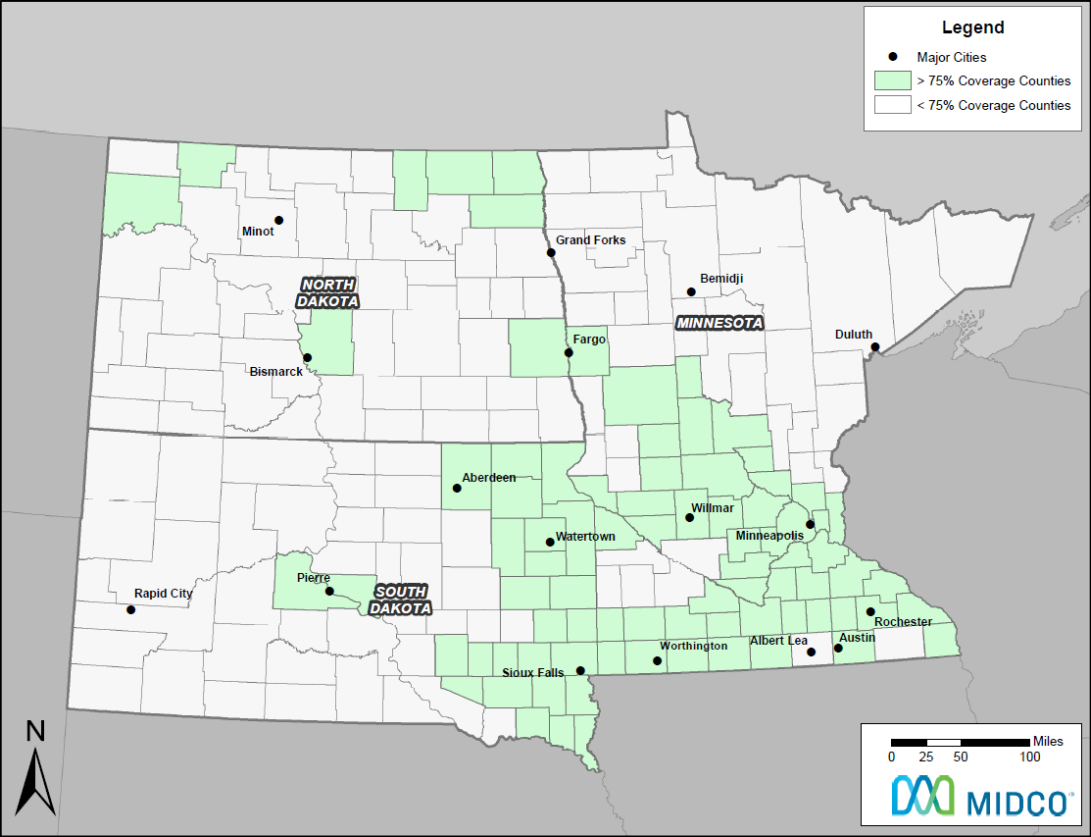
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Rationalization on 50% v. 75% Geography



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Rationalization on 75% v. 80% of Geography

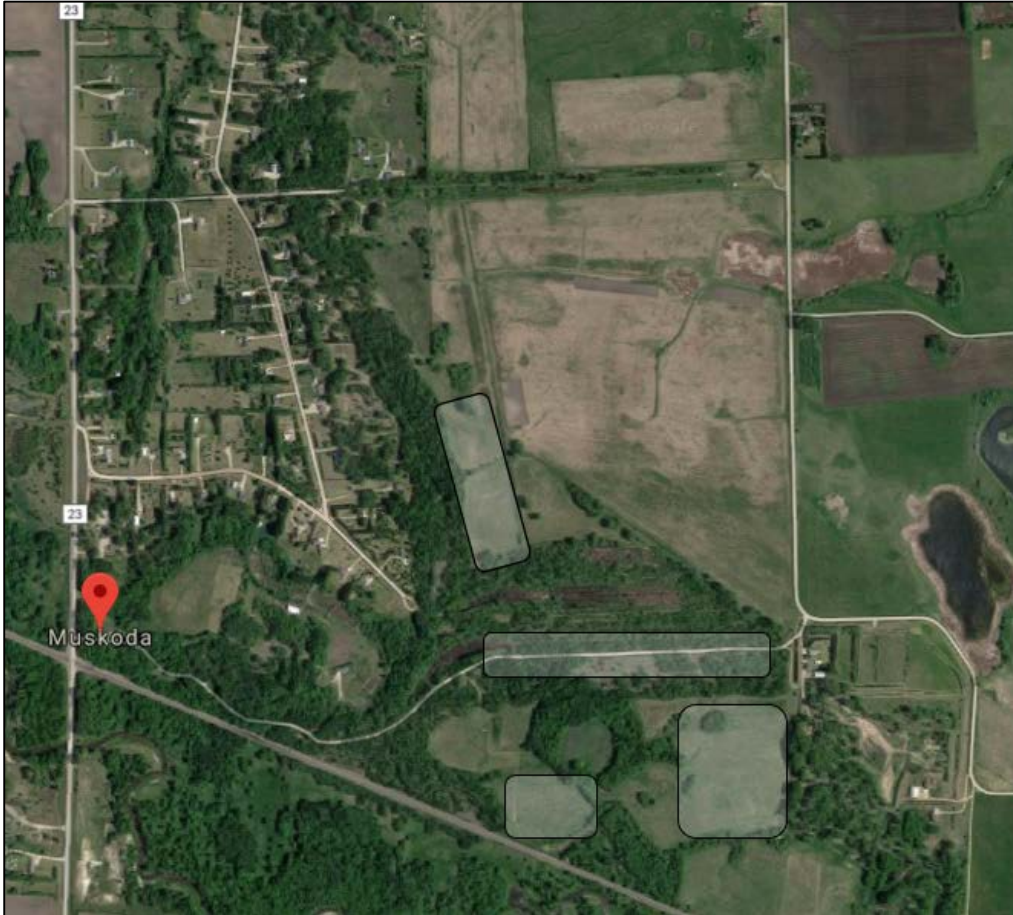


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Keep Educational Use

- Distance learning is still important, but is now via the internet
- E-rate program provides much-needed broadband access
- Compromise on band's intentions with its commercial reality by requiring participation in the E-rate program if the provider covers the institution requesting service

2.5 GHz to Close the Digital Divide



- Rationalize GSA to county if a minimum of 75% of county is covered
- Auction county-sized licenses
- Auction procedures to promote rural broadband development
- Require E-rate program participation

Contact Information

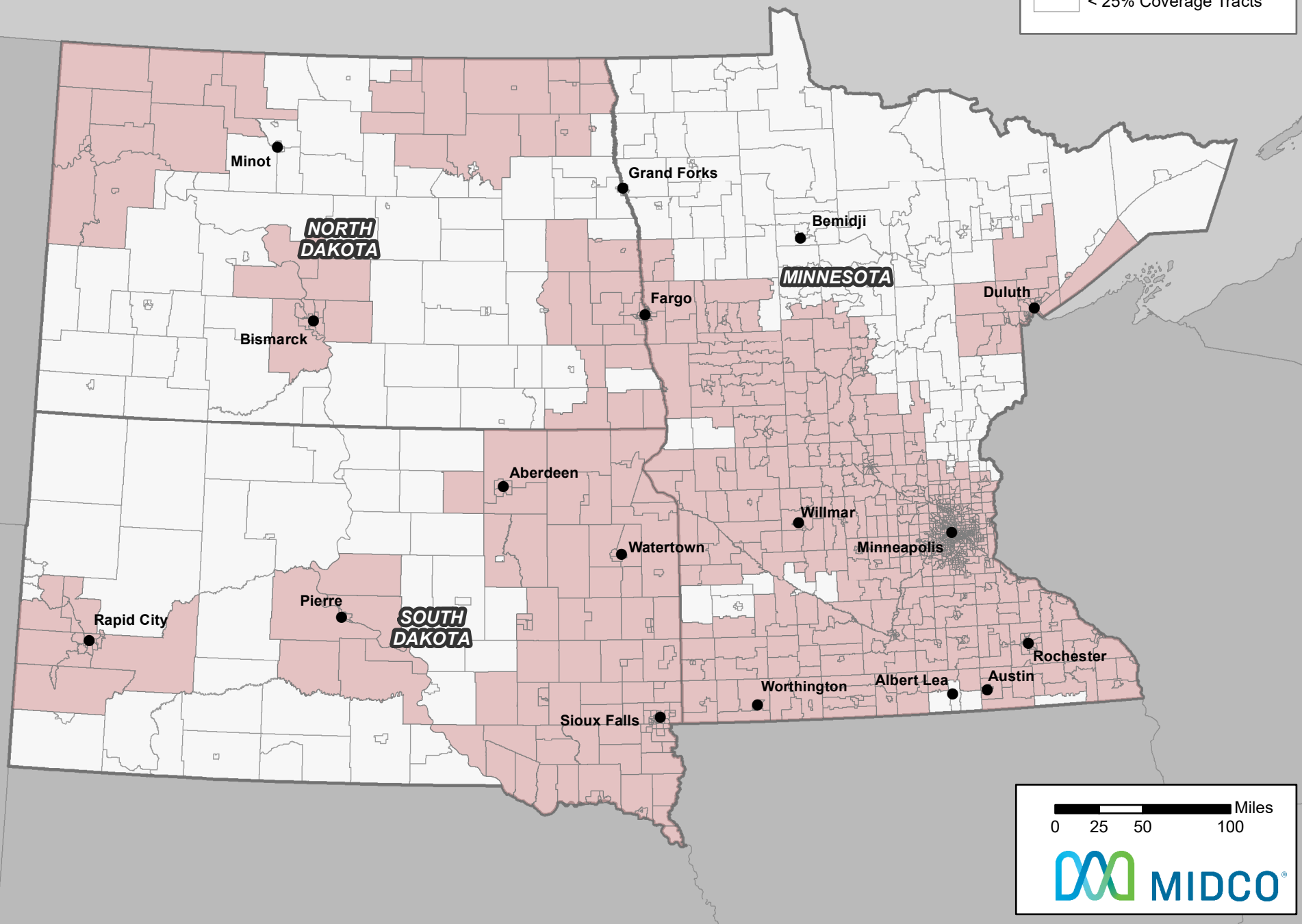
- Scott Anderson
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(605) 274-3020
scott.anderson@midco.com
- Nicole Tupman
Corporate Counsel
(605) 275-6610
nicole.tupman@midco.com



25% Rationalization of Census Tract Geography

Legend

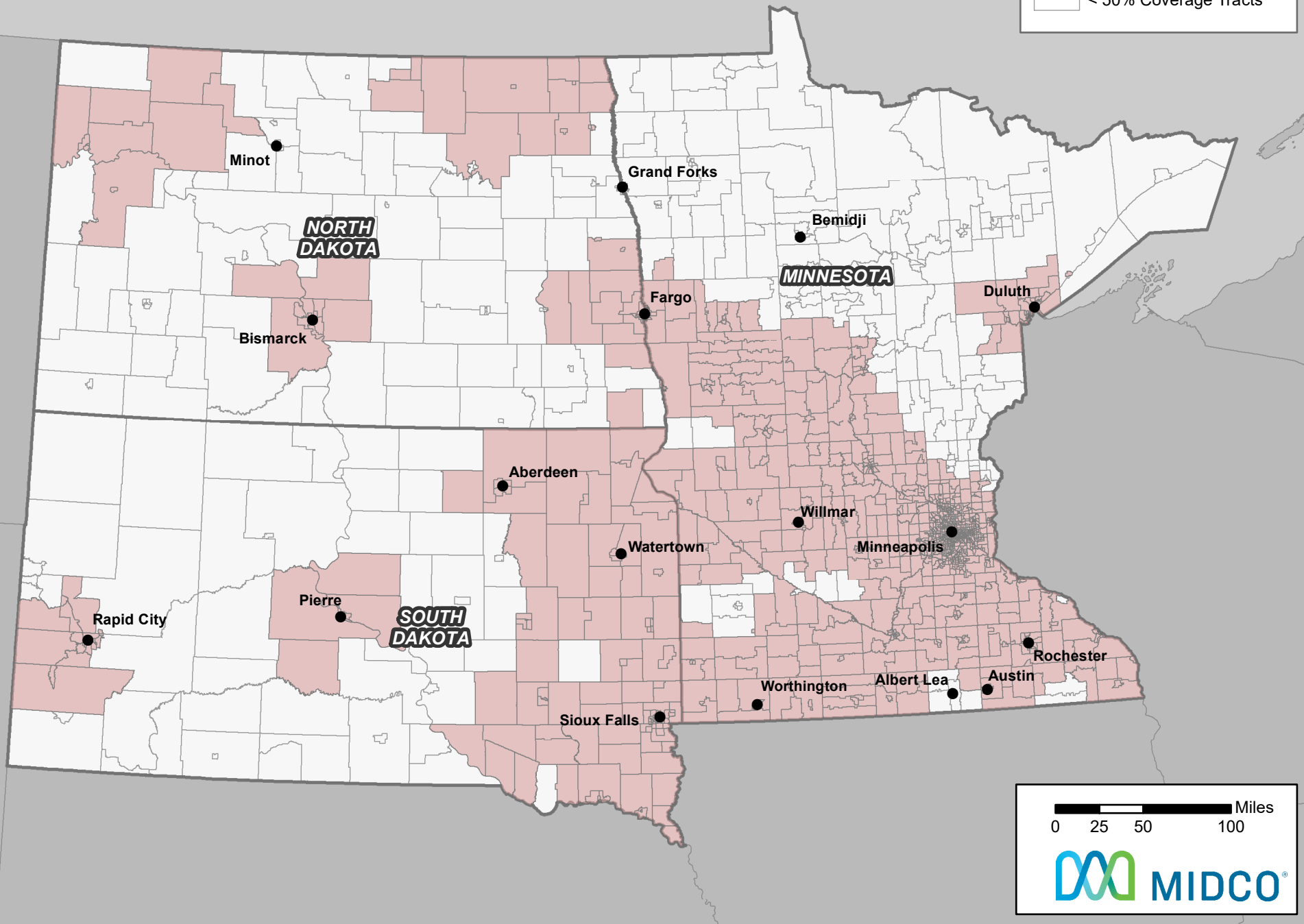
- Major Cities
- > 25% Coverage Tracts
- < 25% Coverage Tracts



50% Rationalization of Census Tract Geography

Legend

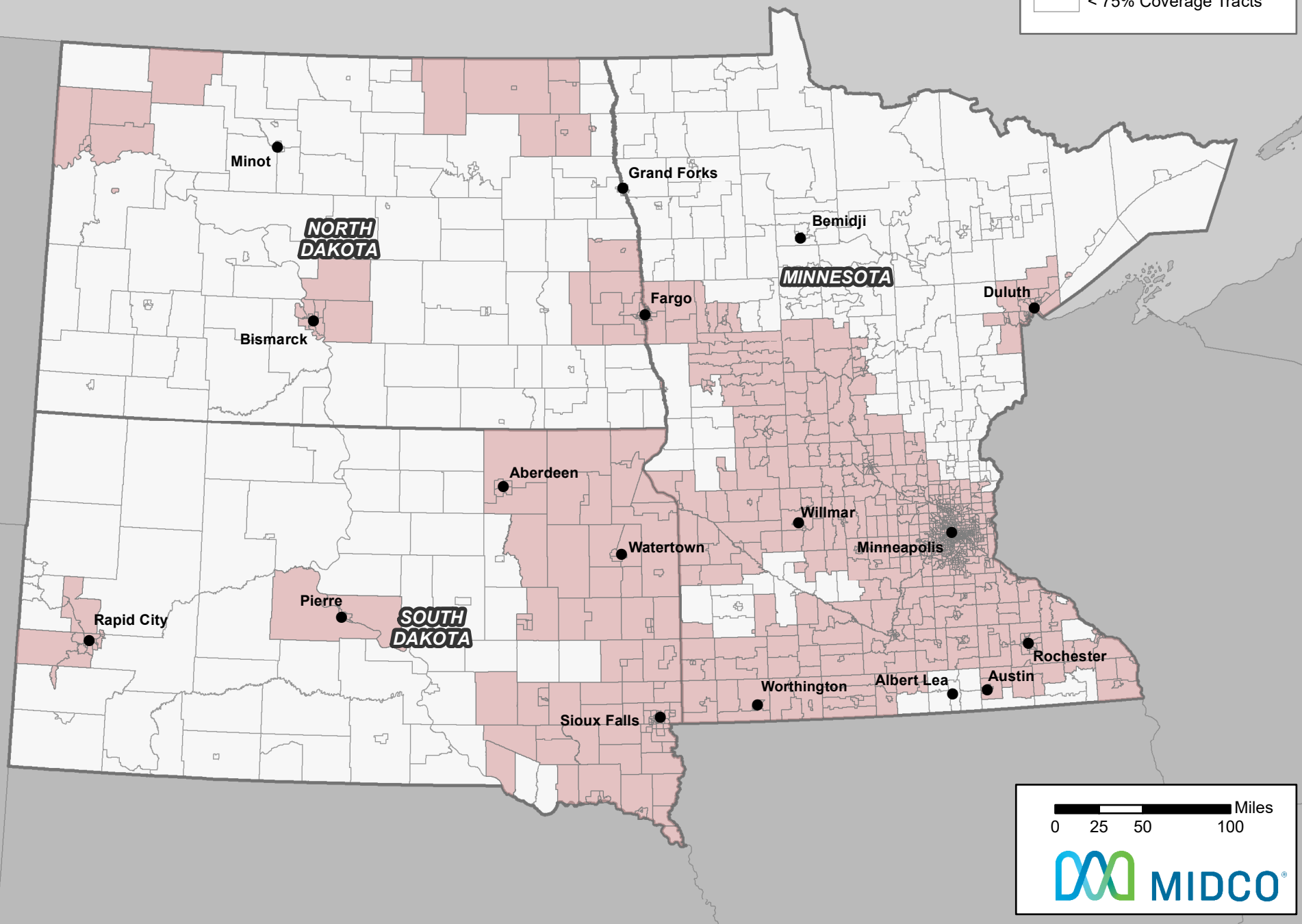
- Major Cities
- > 50% Coverage Tracts
- < 50% Coverage Tracts



75% Rationalization of Census Tract Geography

Legend

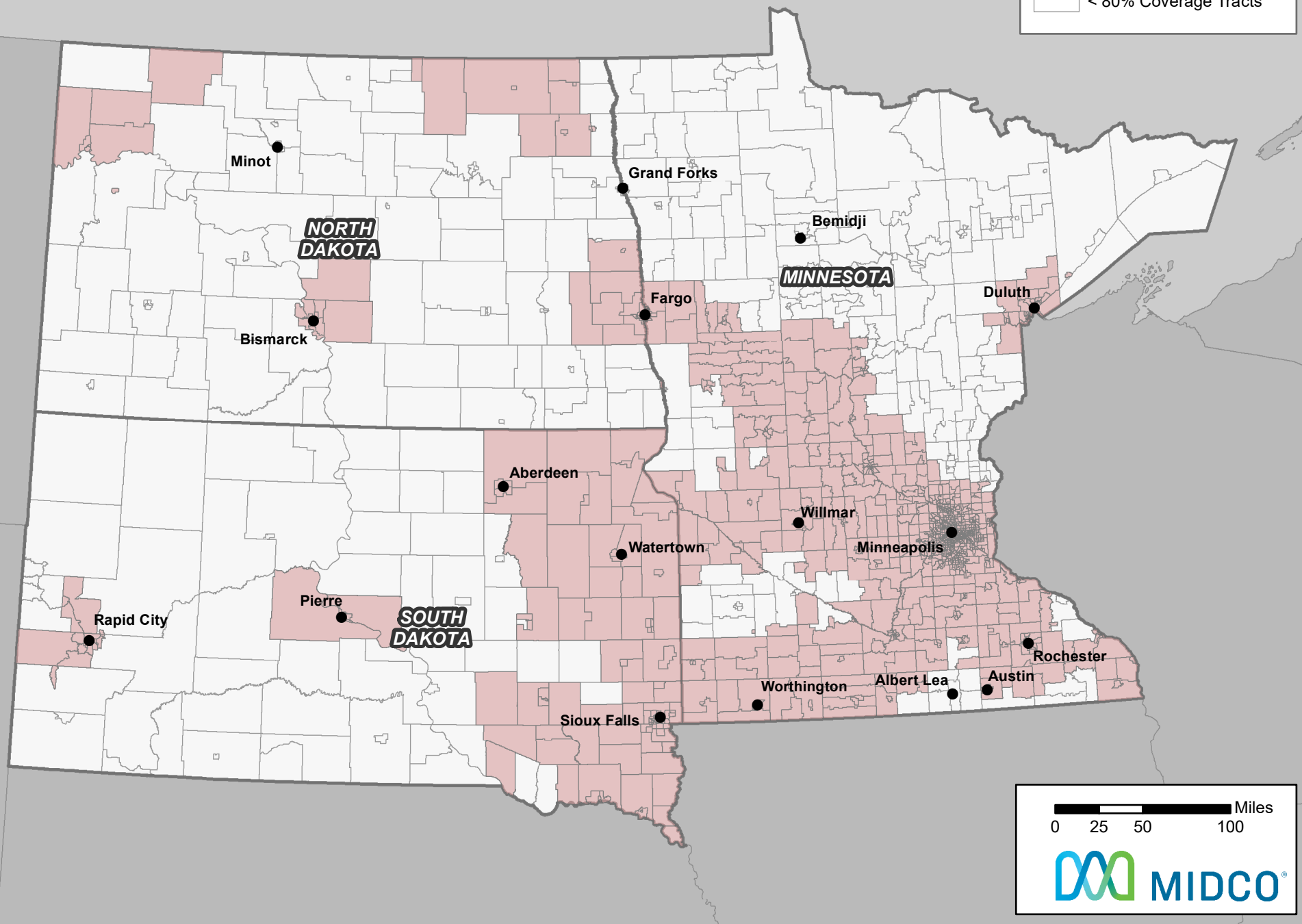
- Major Cities
- > 75% Coverage Tracts
- < 75% Coverage Tracts



80% Rationalization of Census Tract Geography

Legend

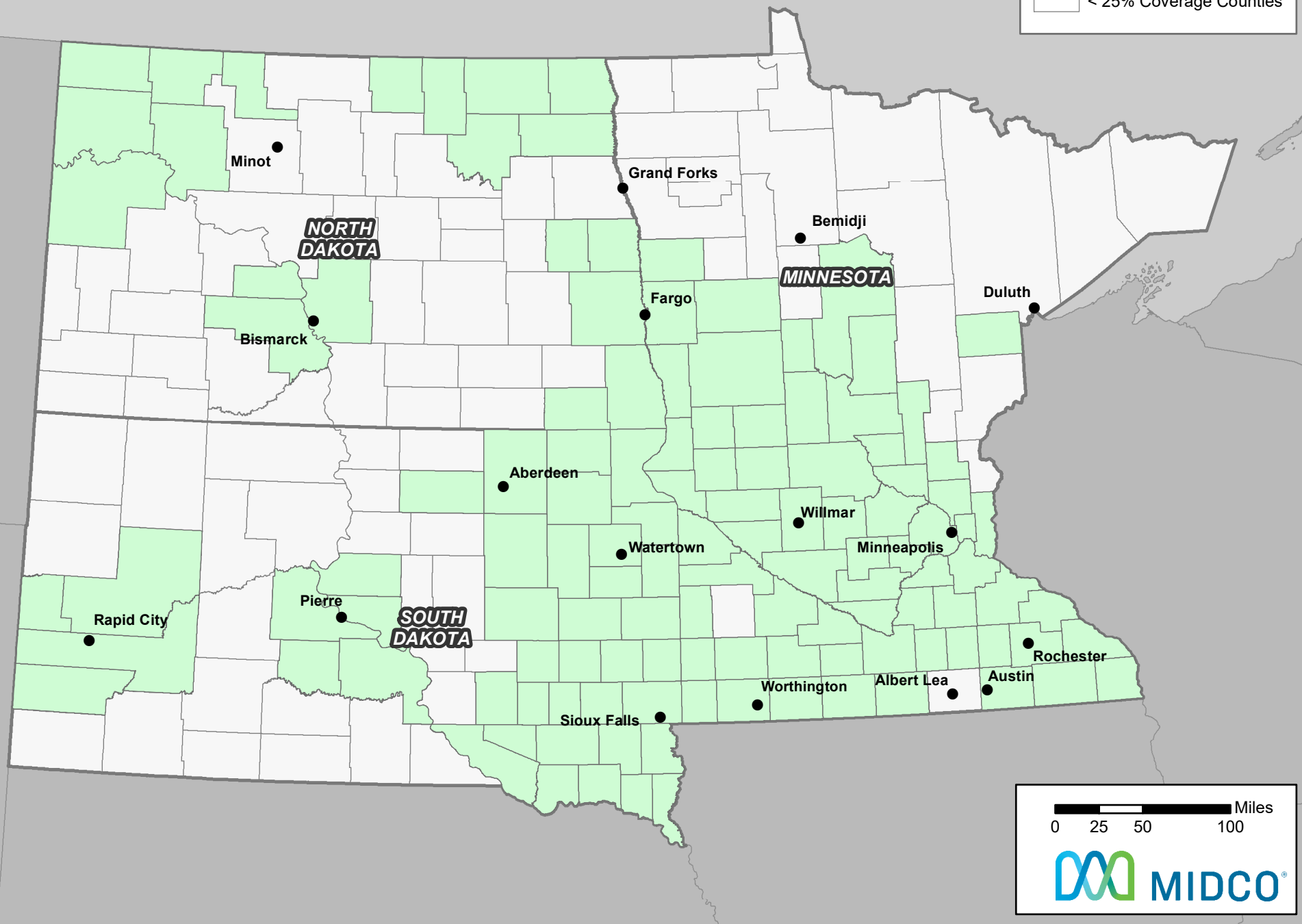
- Major Cities
- > 80% Coverage Tracts
- < 80% Coverage Tracts



25% Rationalization of County Geography

Legend

- Major Cities
- > 25% Coverage Counties
- < 25% Coverage Counties



50% Rationalization of County Geography

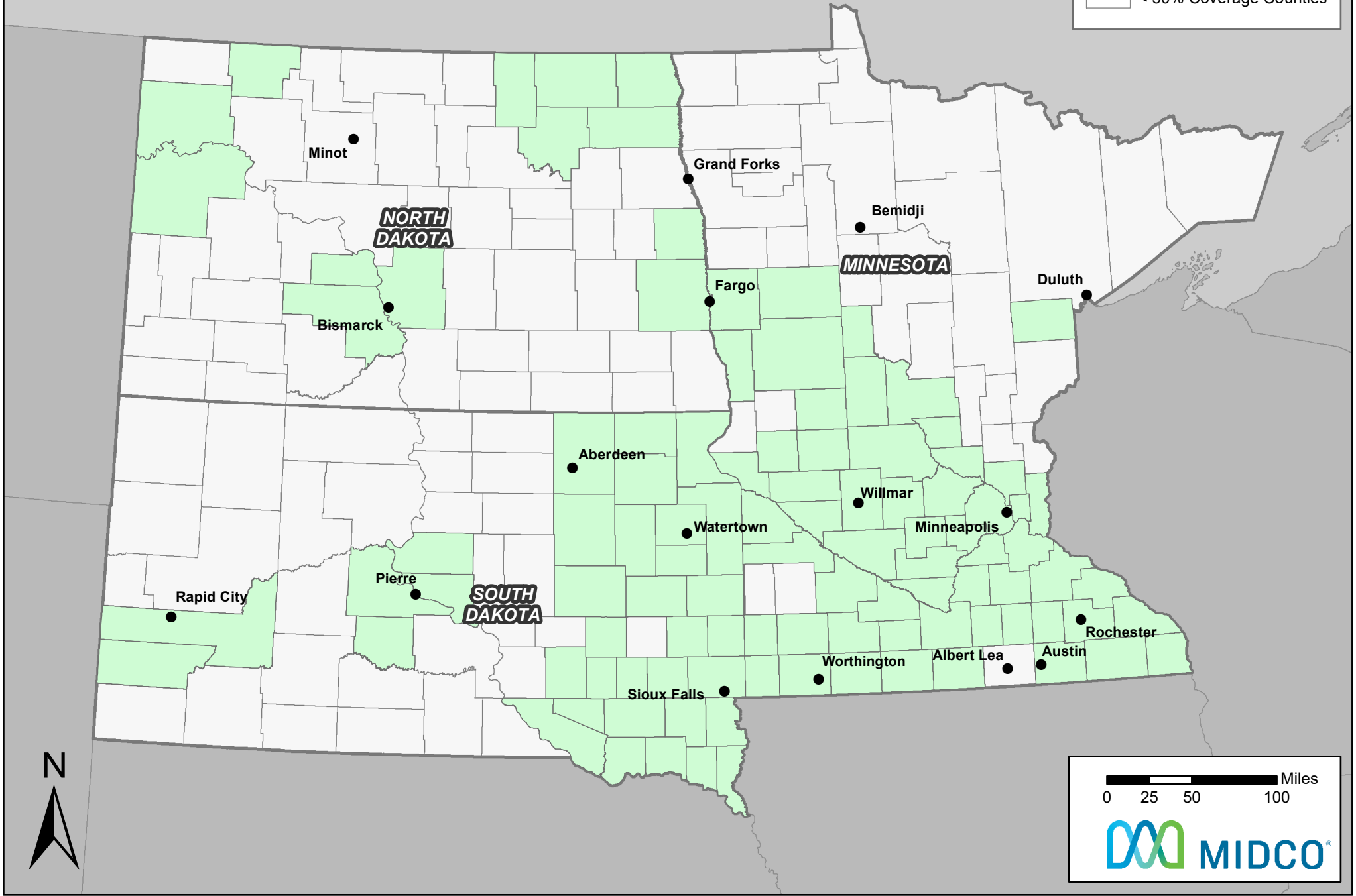
Legend

●

Major Cities

> 50% Coverage Counties

< 50% Coverage Counties



0 25 50 100 Miles

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75% Rationalization of County Geography

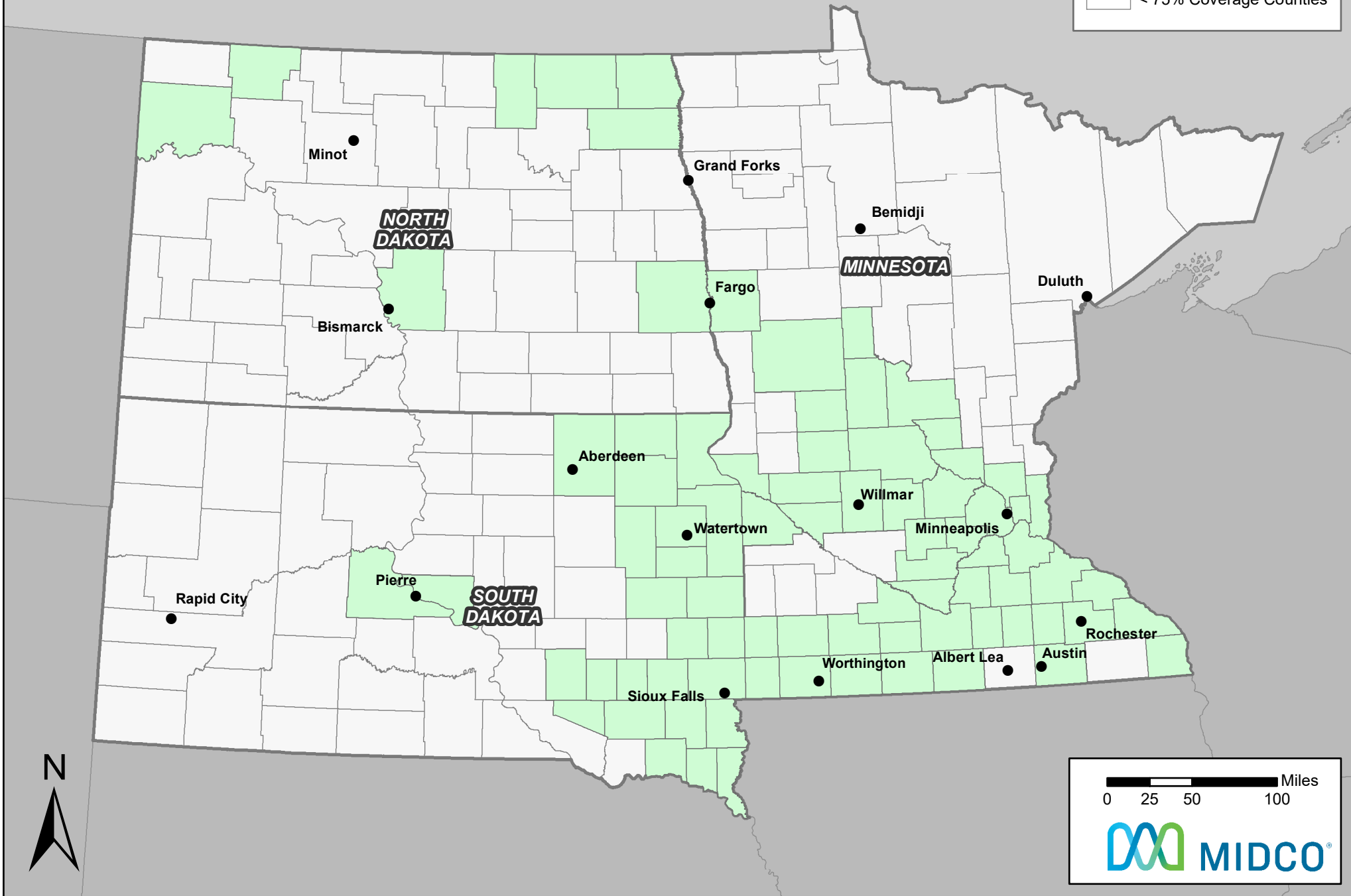
Legend

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Major Cities

> 75% Coverage Counties

< 75% Coverage Counties



0 25 50 100 Miles



80% Rationalization of County Geography

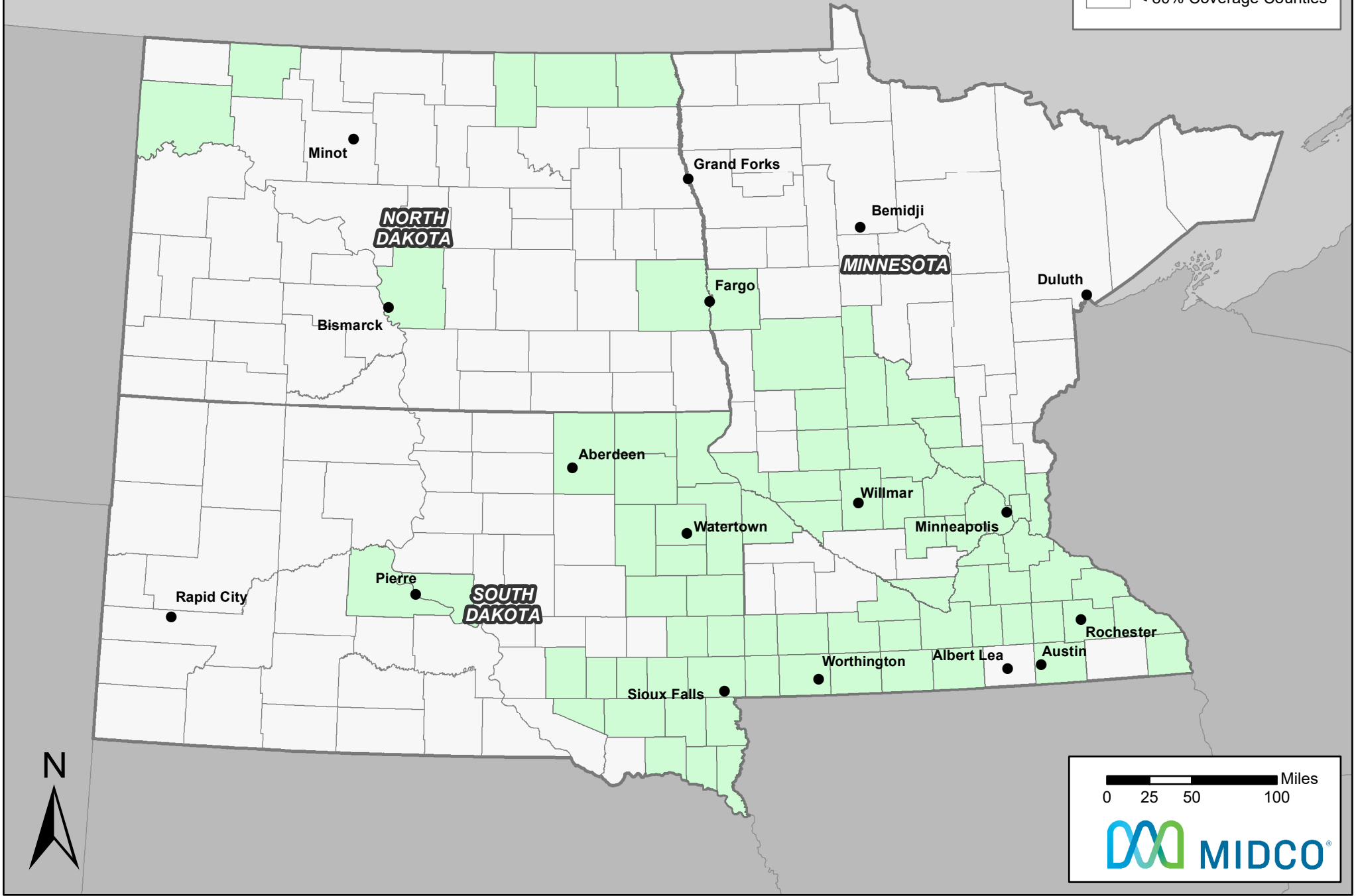
Legend

●

Major Cities

> 80% Coverage Counties

< 80% Coverage Counties



0 25 50 100 Miles

