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September 28, 2018

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

Re: **Wireless Internet Service Providers Association
Transforming the 2.5 GHz Band
WT Docket No. 18-120
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On September 27, 2018, Jeff Kohler, a member of the Board of Directors of the Wireless Internet Service Providers Association (“WISPA”) and Chief Development Officer of JAB Wireless, Inc. (“JAB”), and undersigned counsel to WISPA met with the following staff of the Commission’s Wireless Telecommunications Bureau: Matthew Pearl, Blaise Scinto, John Schauble, Nancy Zaczek, Jonathan Campbell, Nadia Sodos-Wallace and Catherine Schroeder to discuss certain aspects of the above-referenced proceeding.¹

Mr. Kohler noted that JAB, through various subsidiaries, holds excess capacity spectrum leases with 23 Educational Broadband Service (“EBS”) licensees. As the largest fixed wireless broadband provider with 160,000 subscribers in 16 states, JAB has deployed 2.5 GHz spectrum and is interested in gaining access to additional 2.5 GHz spectrum, particularly in areas of the country where EBS spectrum remains unassigned.

Mr. Kohler emphasized the need to make unassigned EBS spectrum available to small businesses. To that end, Mr. Kohler reiterated WISPA’s recommendations² that the Commission employ auctions to make unassigned spectrum available to commercial entities on a county basis in four spectrum blocks, as follows:

¹ See *Transforming the 2.5 GHz Band*, Notice of Proposed Rulemaking, WT Docket No. 18-120, FCC 18-59 (rel. May 10, 2018) (“*NPRM*”).

² See Comments of WISPA, WT Docket No. 18-120 (filed Aug. 8, 2018).



- A1-A3 and B1-B3 – a 33 megahertz contiguous block of spectrum
- C1-C3 and D1-D3 – a 33 megahertz contiguous block of spectrum
- A4, B4, C4, D4 and G4 – a 30 megahertz block of contiguous spectrum
- G1-G3 – a 16.5 megahertz contiguous block of spectrum

Mr. Kohler also discussed the need for the Commission to establish a 63 megahertz spectrum aggregation limit to ensure that bidders would be able to obtain a sufficient amount of spectrum while still ensuring that there would be multiple auction winners in every area. This safeguard would create meaningful opportunities for small broadband providers – those with a proven track record of deploying service in rural America – to acquire licensed spectrum.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

cc: Matthew Pearl
Blaise Scinto
John Schauble
Nancy Zaczek
Jonathan Campbell
Nadia Sodos-Wallace
Catherine Schroeder