

November 6, 2019

**VIA ECFS**

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

**Re: Notice of Ex Parte Presentation**

**GN Docket No. 18-122**, *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*  
**RM-11791**, *Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rule to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3.7-4.2 GHz Band*  
**RM-11778**, *Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Band Shared Between the Fixed Service and the Fixed Satellite Service*

Dear Ms. Dortch:

On November 4, 2019, the undersigned of Charter Communications, Inc. ("Charter") had a call with Julius Knapp of the FCC's Office of Engineering and Technology to discuss the above referenced proceeding. Charter discussed with Mr. Knapp the importance of ensuring that the 3.7-4.2 GHz band ("C-Band") is fully usable for 5G, *i.e.*, usable for downlink and uplink with 100 percent geographical availability, without the need for frequencies in different bands or limitations on deployment options. Relatedly, the Commission should require that C-Band devices be interoperable on the paired blocks across the entire band, as it did in the 600 MHz Band.<sup>1</sup> These technical requirements are imperative to ensure new entrants and smaller carriers can fully rely on the C-Band without the need for alternative spectrum to provide 5G services to consumers.

---

<sup>1</sup> See *In re Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 6866-67, ¶ 732 (2014).

Please direct any questions regarding the foregoing to the undersigned.

Respectfully submitted,

/s/ Elizabeth Andrion

Elizabeth Andrion  
Senior Vice President  
Regulatory Affairs

cc: Julius Knapp