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November 8, 2018

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

Re: *ORAL EX PARTE PRESENTATION – Transforming the 2.5 GHz Band
WT Docket No. 18-120*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(1) of the Commission's Rules to notify the Commission that yesterday, the undersigned counsel for the Wireless Communications Association International ("WCA") met with Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly and Kagen Despain, a law student interning in Commissioner O'Rielly's office. During the course of the meeting, we reiterated the advocacy positions WCA had advanced in its comments and reply comments in this proceeding. In particular, we emphasized that WCA's proposal for rationalizing Educational Broadband Service ("EBS") Geographic Service Areas to county boundaries without regard to the size of the current overlap was a practical solution to the limitations of the Commission's Universal Licensing System. Unlike alternative proposals, this approach is most likely to result in auctioning of the EBS white space without the years of delay that otherwise would be required to identify the specific spectrum available at auction. We also reiterated WCA's arguments against the use of an incentive auction regime for licensing EBS white space. And, we noted the benefits of auctioning the 70 MHz Lower Band Segment spectrum in a single block given that 40 MHz of spectrum appears to be the minimum necessary to provide a robust broadband service in today's marketplace.

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Pursuant to Sections 1.1206(b)(1) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,

/s/ Mary N. O'Connor
Mary N. O'Connor
Paul J. Sinderbrand

Counsel to the Wireless Communications
Association International

cc: Erin McGrath