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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 on November 7, 2018, the undersigned counsel for the Wireless Communications Association International ("WCA") met with Matthew Pearl, Blaise Scinto, John Schauble, Nancy Zaczek, Nadja Sodos-Wallace, and Catherine Schroeder of the Wireless Telecommunications Bureau. 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 ("GSA") 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. 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. Under alternative approaches, the Commission would have to develop and implement some sort of new process to identify those EBS licensees entitled to GSA expansion and then develop a mechanism for advising auction participants of the specific areas available at auction where less than an entire county is available.

In addition, we discussed the public policy considerations supporting the use of an open auction to license the EBS white space. We discussed how potential band participants have been unwilling to accept the uncertainties and associated risks that come from the Commission's unique EBS leasing rules. We further discussed why commercial internet service providers who acquire spectrum at auction were more likely than educators to build out viable broadband networks in the areas of the country where EBS white space is available. We also noted that if the Commission allows educators an exclusive filing window prior to auction, it is highly likely that the Commission will be inundated with mutually exclusive applications advanced by EBS eligibles fronting for commercial operators, just as occurred in the 1990s. That would result in

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substantial delay and economic inefficiencies in the licensing of the EBS white space as compared to a single auction open to all bidders.

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.

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