



November 8, 2017

**VIA ELECTRONIC FILING**

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

**Re: Ex Parte Presentation, Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177; IB Docket No. 15-256; RM-11664; WT Docket No. 10-112; IB Docket No. 97-95.**

Dear Ms. Dortch,

On November 6 and 7, 2017, representatives from CTIA and our member companies met separately with Louis Peraertz of the Office of Commissioner Mignon Clyburn, Erin McGrath of the Office of Commissioner Michael O’Rielly, Kevin Holmes of the Office of Commissioner Brendan Carr, and Umair Javed of the Office of Commissioner Jessica Rosenworcel to discuss the above-captioned proceedings. A full list of meeting attendees is attached to this filing.

During the meetings, CTIA emphasized the importance of maintaining the compromise sharing framework for the 28 GHz and 37-39 GHz bands that the Commission adopted in the 2016 *Spectrum Frontiers Order*. Consistent with its prior advocacy, CTIA also highlighted the need to make significant blocks of spectrum available for licensed terrestrial mobile use to facilitate 5G mobile broadband networks and services. Given the urgency for action, CTIA urged the Commission to set a deadline of 2018 for moving forward with an auction of the bands made available in the 2016 *Spectrum Frontiers Order* and the *Draft Second Order*.

CTIA also urged the Commission to clearly indicate its intention to move rapidly to allow use of the 32 GHz, 42 GHz, and 50 GHz bands within a fixed timetable, to seek expeditious comment on the use of the 26 GHz band for terrestrial mobile wireless, and to not foreclose discussion of expanding the Part 30 framework to the remaining Local Multipoint Distribution Service bands.



Finally, CTIA discussed its continued interest in developing a framework for the 37-37.6 GHz band that will promote investment.<sup>1</sup> This six hundred megahertz of spectrum is largely “greenfield” and is directly adjacent to the 37.6-40 GHz band,<sup>2</sup> thus allowing licensed use of the spectrum would present an opportunity to create a large, three gigahertz band of spectrum that would allow for rapid and effective deployment of 5G services. CTIA explained that requiring wholesale sharing and complex coordination processes, as suggested by some parties,<sup>3</sup> would endanger the expeditious use of this valuable spectrum.<sup>4</sup> Moreover, coordination with primary federal users of the 37-37.6 GHz band, as has been accomplished successfully in the AWS-1 and AWS-3 spectrum bands, would allow for seamless sharing with federal incumbents. The Commission should therefore enable continued conversations regarding the use of the 37-37.6 GHz band and expeditiously reconsider its licensing framework in the next phase of this proceeding.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed in ECFS and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann

Vice President, Regulatory Affairs

Attachment

cc: Louis Peraertz  
Erin McGrath  
Kevin Holmes  
Umair Javed

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<sup>1</sup> See Petition for Reconsideration of CTIA, IB Docket No. 14-177, *et al.*, at 24-26 (filed Dec. 14, 2016) (“CTIA Petition”).

<sup>2</sup> *Id.* at 25.

<sup>3</sup> See *e.g.*, *Ex Parte* Communication of Starry, Inc., IB Docket No. 14-177, *et al.* (filed Nov. 3, 2017).

<sup>4</sup> CTIA Petition at 25.



### Meeting Participants

**November 6, 2017 – Office of Commissioner Brendan Carr**

**Commissioner's Office**

Kevin Holmes

**CTIA**

Scott Bergmann

Kara Graves

**CTIA Members**

Stacey Black, AT&T

Gardner Foster, Sprint

John Hunter, T-Mobile

Greg Romano, Verizon

**November 7, 2017 – Office of Commissioner Mignon Clyburn**

**Commissioner's Office**

Louis Peraertz

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Scott Bergmann

Paul Anuskiewicz

Kara Graves

**CTIA Members**

Stacey Black, AT&T

Gardner Foster, Sprint

John Hunter, T-Mobile



**November 7, 2017 – Office of Commissioner Michael O’Rielly**

**Commissioner’s Office**

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Paul Anuskiewicz  
Kara Graves

**CTIA Members**

Stacey Black, AT&T  
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Greg Romano, Verizon

**November 7, 2017 – Office of Commissioner Jessica Rosenworcel**

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Gardner Foster, Sprint  
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