



November 9, 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 9, 2017, Jen Oberhausen of CTIA spoke separately via phone with Rachael Bender of the Office of Chairman Ajit Pai, Erin McGrath of the Office of Commissioner Michael O’Rielly, and Kevin Holmes of the Office of Commissioner Brendan Carr to discuss the above-captioned proceedings.

During the calls, CTIA emphasized the importance of broadly maintaining the compromise sharing framework for the 28 GHz and 37-39 GHz bands that the Commission adopted in the 2016 *Spectrum Frontiers Order*. More specifically, CTIA urged the Commission to maintain the protection of arterial streets as adopted rather than adopt the “clarifications” to the transient population rules proposed in the *Draft Order on Reconsideration*.<sup>1</sup> Protecting satellite earth stations along arterial streets could hamper 5G deployment in rural areas that may have high demand from traffic converging along those roads. Rather than eliminate protection for rural principal arterial streets and urban and rural minor arterial streets as proposed in the draft item, the Commission should instead continue to protect all arterial streets so as not to risk disruption of next-generation services.<sup>2</sup> Separately, CTIA also discussed the potential international implications of the draft item in the context of the WRC-19 process.

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<sup>1</sup> *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order, FCC-CIRC1711-02, ¶ 127, Appendix A § 25.136(c)(3) (draft rel. Oct. 26, 2017).*

<sup>2</sup> Specifically, CTIA requests that the Commission eliminate paragraph 127 from the draft item and retain existing § 25.136(c)(3) as adopted in the 2016 *Spectrum Frontiers Order*.



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/ Jennifer L. Oberhausen

Jennifer L. Oberhausen  
Director, Regulatory Affairs

cc: Rachael Bender  
Erin McGrath  
Kevin Holmes