



November 15, 2019

VIA ELECTRONIC FILING

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

Re: ***Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122***

Dear Ms. Dortch:

The C-Band Alliance (“CBA”) previously has set out the significant public interest benefits that would flow from allowing incumbent C-Band satellite operators to quickly and efficiently make 300 MHz of prime mid-band spectrum available for 5G use, while managing the transition of existing users of this spectrum to prevent disruptions. The CBA is uniquely positioned to deliver this win-win for U.S. 5G competitiveness with minimal disruption. By this letter, the CBA provides a commitment that further demonstrates the public interest benefits of its proposal and addresses the Congressional goals expressed to benefit the U.S. Treasury.

CBA Commitment. If the FCC adopts the CBA proposal, the CBA commits to pay a portion of net proceeds of a CBA-led auction to the U.S. Treasury pursuant to the following progressive formula: 30% of net proceeds up to \$0.35/MHz-POP, 50% of incremental net proceeds up to \$0.70/MHz-POP, and 75% of incremental net proceeds thereafter. Net proceeds are proceeds received from the auction less the costs incurred to plan for and take all actions to implement the CBA proposal to clear 300 MHz of spectrum. This payment to the U.S. Treasury would be inclusive of all Federal income tax liabilities incurred by the CBA member companies as a direct result of the auction.

This CBA commitment could provide billions of dollars to the U.S. Treasury at a critical time, while still ensuring that expensive transition costs are covered and that mid-band spectrum is made available for 5G on a time frame that would realistically be years ahead of any other proposal on the record. The CBA’s expedited timeline remains especially important as the U.S. seeks to maintain leadership in 5G over global competitors. If the FCC acts in December to adopt the CBA proposal, the CBA commits to commence the auction in the first three months of 2020.

Equally important is the significant impact for consumers across the U.S. – especially in suburban and rural areas – who will most benefit from the 5G innovation and new services enabled by mid-band spectrum’s unique propagation characteristics.

Rural Broadband. In order to ensure that all Americans receive the benefits of 5G, the CBA is working in good faith with various members of Congress to develop a proposal using a portion of the contribution to the U.S. Treasury to fund the deployment of an open access 5G network for rural broadband. This network would be deployed by a third party within 5 years of the spectrum being available and provide service on a non-discriminatory, wholesale basis to over 100 million Americans.



Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

_____/s/
Bill Tolpegin
Chief Executive Officer
C-Band Alliance