



November 17, 2017

VIA ELECTRONIC FILING

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

Re: *Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319.*

Dear Ms. Dortch,

CTIA has been actively engaged in the development of the Citizens Broadband Radio Service ("CBRS") in the 3550-3700 MHz ("3.5 GHz") band. Among other things, we have submitted various filings with the Federal Communications Commission ("Commission"), continually participated in—and taken leadership roles within—multistakeholder groups developing 3.5 GHz band-related specifications and standards, and engaged in discussions with industry and federal stakeholders on ensuring the novel three-tier sharing concept is workable. CTIA remains committed to the success of the 3.5 GHz band.

On May 16, 2016, CTIA submitted an application to develop and manage an independent Spectrum Access System ("SAS") and Environmental Sensing Capability ("ESC").¹ After careful consideration, CTIA writes to notify the Commission that it is withdrawing its application to be designated as a SAS Administrator and an ESC Operator. CTIA's interest in becoming a SAS Administrator and ESC Operator was primarily to ensure our member companies had the opportunity to leverage the new band. Given the number of commercial entities seeking SAS Administrator and ESC Operator status, CTIA feels comfortable that a competitive SAS and ESC market will develop for the innovative CBRS three-tier spectrum access regime.

¹ See Letter from Paul Anuskiewicz, CTIA, to Marlene H. Dortch, FCC, GN Docket No. 15-319 (filed May 16, 2016); see also *Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band*, Public Notice, 31 FCC Rcd 13355 (2016).



The decision to withdraw CTIA's applications is a business decision that is independent of CTIA's ongoing commitment toward, and activity advancing, policies and practices that will foster investment and innovation in the 3.5 GHz band, as this mid-band spectrum offers great promise for 5G and other innovative uses. We appreciate the Commission's efforts and those of the Wireless Telecommunications Bureau and Office of Engineering and Technology in fostering 3.5 GHz band rules that will enable robust, innovative deployments, and we look forward to continuing to work with the Commission and interested stakeholders on ensuring the success of this framework. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Paul Anuszkiewicz

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