



Email: nicole.tupman@midco.com

November 20, 2019

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

Re: Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 18-122; Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295; Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 17-183; Rural Digital Opportunity Fund, WC Docket No. 19-126; and Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On November 20, 2019, representatives of Midco, namely Jon Pederson, Chief Technology Officer, Andrew Curley, Director of Government Relations, and the undersigned, had a telephonic conference with Will Adams and Joseph Calascione from Commissioner Carr's office. Midco shared the enclosed presentation during its conference.

Midco shared the successful fixed wireless testing that it recently completed using its experimental C-Band license. Midco commended the Commission for the recent proposal to use a public auction for the lower 280 MHz of the C-Band and discussed mechanisms through which the Commission could ensure a variety of technology companies are able to participate in an auction, including: using county-sized licenses, at least in rural areas; auctioning spectrum in 20 MHz, 40 MHz, or similarly-sized licenses; and instituting reasonable aggregation limits.

Midco also discussed its interest in sharing the upper portion of the C-Band as suggested in the study conducted by Professor Reed at Virginia Tech and as supported by various parties, including WISPA and Google. Midco believes that the reasonable limits suggested by the Reed Study would protect its C-Band cable operations where those licenses exist while allowing other technologies, including fixed wireless, to use otherwise fallow spectrum outside the protection zone.

In discussing Fixed 5G technology, Midco conveyed its interest in the 6 GHz band. In order to use outdoor fixed wireless in the U-NII-5 and U-NII-7 bands, however, the Commission would need to increase the proposed deployment height from 30 meters to at least 90 meters and increase the maximum EIRP on the Customer Premise Equipment to a flexible 36 dBm. The potential of an additional 850 MHz of spectrum, combined with the C-Band and other bands, will enable Gig speeds for fixed wireless customers.

Finally, Midco shared its excitement for the Rural Digital Opportunity Fund (RDOF) to help close the Digital Divide efficiently. From its extensive experience with fiber and wired networks, Midco knows that fixed wireless is a key technology to provide broadband to the most rural customers. To that end, Midco supports adding in an additional tier of 50/5 Mbps with a weight of 30, and keeping a weight of 15 for the 100/20 Mbps tier. Midco also discussed its concerns with the proposed subscribership requirement and the practical hurdles of ensuring subscribership in rural America.

In accordance with Section 1.1206(b) of the Commission's rules, I have filed a copy of this notice electronically in the above-referenced dockets. Please address any questions regarding the foregoing to me.

Sincerely,

/s/ Nicole Tupman

Nicole Tupman
Assistant General Counsel

Enclosures

cc: Will Adams
Joseph Calascione