November 21, 2018

**Via Electronic Filing**

Marlene H. Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, SW

Washington, DC 20554

Re: *Transforming the 2.5 GHz Band* – WT Docket No. 18-120 *– NOTICE OF EX PARTE PRESENTATION*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission’s rules to report that on November 19, 2018, Dr. Patrick Gossman, Deputy CIO, Wayne State University and Executive Director, Community Telecommunications Network, Inc., Eric Smith, Director of Broadcast and Audio Visual Services, Northern Michigan University, Joel Phillips, Director of Technology Services and Security, Newaygo County (MI) Regional Educational Service Agency, Fred Sharpsteen, Director of Technology, Mecosta-Osceola (MI) Intermediate School District, and the undersigned counsel for Wayne State University and Community Telecommunications Network, Inc., met with Blaise Scinto, Matthew Pearl, John Schauble, Nancy Zaczek, Nadja Sodos-Wallace, and Catherine Schroeder of the Wireless Telecommunications Bureau regarding the referenced proceeding.

The visiting Michigan educators presented extensive information showing how Educational Broadband Service (“EBS”) frequencies have been successfully deployed by Northern Michigan University to provide broadband service to chronically underserved populations throughout sparsely populated areas of Michigan’s Upper Peninsula, thus closing the “homework gap,” and that critical needs for broadband service exist in other rural and underserved areas of Michigan that could be met if EBS frequencies were made available by the Commission to local educators. The 2.5 GHz band is particularly well suited for educators seeking to close the “homework gap” in rural communities because of its propagation characteristics, which are superior in terrain-challenged, rural, forested areas as compared, for example, to frequencies in the 3.5 GHz band.

The visiting educators acknowledged that, to date, there have been a limited number of education-based EBS network deployments such as Northern Michigan University’s, but pointed out that new EBS spectrum has not been available for this purpose for the last 23 years except through a rare waiver process. Even though EBS rules were changed in 2005 and wireless network technology in the 2.5 GHz band has since become affordable, rural educators have not had access to EBS spectrum to build networks and reach unserved and underserved students and their families.

The visiting educators also described that there is no realistic prospect these sparsely populated rural areas would be fully served by commercial operators if the Commission merely auctions EBS spectrum to the highest bidder, even if accompanied by government subsidy programs that might be funded through auctioning of EBS spectrum. Commercial offerings, even if available, suffer from high cost and geographic and service limitations that fail the needs of modern education. The visiting educators urged that the Commission should therefore adopt priority filing windows as a licensing mechanism for EBS, as proposed in the Notice of Proposed Rulemaking in WT Docket No. 18-120 and widely supported by the EBS, educational and public service communities.

The visiting educators shared the attached documents, including an outline of their presentation, a description of Northern Michigan University’s EBS deployment and Educational Access Network and how that Network could easily be expanded to provide service in other areas of rural Michigan, a description of an educational network in Newaygo County that has relied to date on unlicensed spectrum but now needs to obtain EBS spectrum to fully serve that rural county’s educational needs, and a description of the “homework gap” problem in rural and poor counties in Michigan, including Mecosta, Osceola and Lake Counties.

Respectfully submitted,



Todd D. Gray

cc Blaise Scinto

Matthew Pearl

John Schauble

Nancy Zaczek

Nadja Sodos-Wallace

Catherine Schroeder