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December 5, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **Wireless Internet Service Providers Association  
WC Docket No. 10-90 and AU Docket No. 17-182  
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On December 4, 2017, undersigned counsel to the Wireless Internet Service Providers Association (“WISPA”) met with the following members of the Commission’s Rural Broadband Auctions Task Force: Chelsea Fallon, Margie Weiner, Thom Parisi, Martha Stancill, Mark Montano, Alexander Minard, Heidi Lankau and Angela Kung. The purpose of the meeting was to discuss proposals in the Commission’s *Public Notice* seeking comment on program requirements for the Connect America Fund Phase II auction (Auction 903).<sup>1</sup>

I reiterated that an applicant proposing to use spectrum in its bid should not be required to submit propagation maps for the census block group(s) for which it intends to bid.<sup>2</sup> While an applicant should demonstrate in its short-form application that it has undertaken due diligence, requiring submission of propagation maps, conceivably for every possible compilation of spectrum bands and census block groups, would be impractical, unfair and inefficient. In response to the Task Force’s question, a fixed wireless broadband provider will typically create propagation maps before expanding into new areas in order to determine whether there is a critical mass of potential customers to justify a certain level of investment. This effort is

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<sup>1</sup> See *Public Notice*, “Comment Sought on Competitive Bidding Procedures and Certain Program Requirements for the Connect America Fund Phase II Auction (Auction 903),” AU Docket No. 17-182 and WC Docket No. 10-90, FCC 17-101 (rel. Aug. 4, 2017) (“*Public Notice*”).

<sup>2</sup> See Comments of WISPA, AU Docket No. 17-182 and WC Docket No. 10-90 (filed Sept. 18, 2017); Reply Comments of WISPA, AU Docket No. 17-182 and WC Docket No. 10-90 (filed Oct. 18, 2017).



generally inexpensive (a few hundred dollars) and is not conducted at the census block level and does not necessarily take into account whether locations are unserved. However, to demonstrate coverage to at least 95 percent of the unserved locations in a census block within a census block group would take considerably more time, and the cost may exceed \$1,000 per census block group. I further explained that the list of spectrum bands eligible for the auction should not be limited to those on proposed Schedule B, but should include other bands where the applicant can demonstrate its ability to meet the selected performance tier(s).

With respect to the financial screen proposed in the *Public Notice*, I pointed out that the proposed criteria would not serve as an effective screen because nearly all bidders would be subject to more in in-depth review. I also pointed out that the proposed screen does not adequately reflect the manner in which broadband companies utilize their capital. I reiterated WISPA's request for the Commission to streamline the criteria.

I also urged the Commission to retain census block groups as the geographic bidding unit. Smaller sizes, such as census blocks, would likely create more of a patchwork quilt of supported and unsupported areas in close proximity to each other.

We discussed ways in which the Commission could simplify the auction, for the benefit of smaller broadband companies that may not have, or be able to hire, the expertise to assist them during the auction. I reiterated WISPA's recommendations that the Commissioner eliminate inter-round switching of performance tiers and limit package bidding.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

Respectfully submitted,

/s/ Stephen E. Coran  
Stephen E. Coran

cc: Chelsea Fallon  
Margie Weiner  
Thom Parisi  
Martha Stancill  
Mark Montano  
Alexander Minard  
Heidi Lankau  
Angela Kung