

Dynamic Spectrum Alliance Limited

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December 12, 2017

Ex Parte

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. 17-183**

Dear Ms. Dortch:

On December 12, 2017, Kalpak Gude, President of the Dynamic Spectrum Alliance (DSA), and Michael Calabrese (New America), on behalf of the DSA met with Julius Knapp, Matthew Hussey, and Michael Ha of the Office of Engineering Technology, regarding the above-listed proceeding.

Mr. Gude and Mr. Calabrese stressed the importance of the FCC improving the information that the FCC currently has in its IBFS database. Without accurate information, it will be impossible for the Commission to move forward with any of the proposed mechanisms in the Mid-Band NOI proceeding to make more efficient use of the 3.7-4.2 GHz band. We further supported most of AT&T's suggestions in their Mid-Band NOI Comments regarding the FCC auditing the C-band registration database by considering the following actions:

- Announcing that the Commission will be conducting a “refresh” of the C-Band database and allowing a period of time for operators who previously did not register to do so;
- Confirming that the active registrations in the database are current and correct, including requiring confirmation from registrants that their earth stations remain operational and are identified by accurate coordinates;
- Notifying all C-Band registrants of their obligation to cancel earth station registrations that are no longer used, while providing an amnesty period for licensees to update such records and allow the registrations to be removed from the database; and
- Collecting additional operational data from C-Band earth station licensees— including the last time their earth stations were operational, the specific frequencies and amount of bandwidth currently in use, and the satellites and/or transponders with which they have communicated in the past license term—to ensure that registrations in the database are active and fully in use. (DSA added several elements to this bullet in addition to what was included in AT&T's comments)

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We further urged that due to the challenges and delays that may be caused by the Paperwork Reduction Act requirements for conducting data collections, that the FCC consider starting the process on a voluntary basis while moving forward with the necessary approvals for a mandatory data collection. We also raised the issue of the need to move rapidly on the 6 GHz portion of the proceeding, as the issues in that portion of the band are entirely separate from the 3.7 GHz issues.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kalpak Gude', is written over a light grey horizontal line.

Kalpak Gude
President
Dynamic Spectrum Alliance