

December 18, 2018

Ex Parte

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

Re: *Transforming the 2.5 GHz Band*, WT Docket No. 18-120

Dear Ms. Dortch:

On Thursday, December 13, 2018, Katherine Messier of the North American Catholic Educational Programming Foundation, Inc. (NACEPF) and Mobile Beacon and I met with Erin McGrath, Legal Advisor to Commissioner O’Rielly.

In our meeting, we explained how the Commission can best achieve its goal of intensive use of EBS spectrum while promoting both rural deployment and educational use by modernizing, but retaining, its educational eligibility and usage rules, and automatically rationalizing existing license areas along county lines for all licensees. With respect to unassigned EBS spectrum, we discussed how priority windows that give tribal and educational institutions a meaningful chance to participate will speed licensing, accelerate deployment, and achieve spectrum policy diversity that will help bridge the digital divide. By adopting build out requirements for EBS spectrum assigned through priority windows, the Commission can protect against any downsides to this approach.

Finally, we emphasized that the Commission should treat all EBS licensees equally, and not reduce or eliminate existing license areas. Doing otherwise would strand significant investments already made in providing broadband service, disrupt long-settled commercial agreements, and cause consumers to lose existing service.

Sincerely,

Stephanie Weiner
Counsel to NACEPF and Mobile Beacon

Cc: Erin McGrath