

December 26, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, D.C. 20554

Dear Ms. Dortch,

Since 2010, Select Spectrum has been assisting its clients in marketing, selling, buying and leasing spectrum licenses in the secondary market. Select Spectrum has assisted its clients in over 200 spectrum transactions, across 15 different FCC bands, including narrowband and wideband licenses in the Automated Maritime Telecommunications System, other 217-222 MHz licenses, the 450 MHz Band and the Upper 700 MHz A Block. The company has assisted with many broadband spectrum transactions including PCS, 2.5 GHz and 3.65 GHz licenses.

As an active participant in the secondary market for spectrum licenses, Select Spectrum is aware that some FCC licenses are less than fully utilized. One of the reasons that licenses are underutilized is that operators may not have the need to serve the full geographic size of the license. In some cases the license size may significantly exceed the area that can be economically justified for wireless network buildout and coverage.

Select Spectrum believes the originally planned size of PALs – to fit a Census Tract – is appropriate to the band. In rural areas with limited numbers of buildings, CBRS signals propagate well and a limited number of sites can provide good coverage of a full census tract while meeting FCC transmission rules. In urban areas, low-power small cells are more appropriate for CBRS frequencies, and such cell sizes match urban Census tract sizes well.

While in the auctions it will be possible for larger corporate operators to acquire multiple census tract PALs to cover larger areas such as the proposed PEAs or counties, it would be impractical and cost prohibitive for end users or smaller commercial operators to acquire full counties or the proposed PEAs. Increasing the coverage size of the PALs would likely result in reduced revenues for the auction, reduced use of the band and significant gaps in coverage, especially in the rural areas where broadband Internet access services are often unavailable, or sometimes costly and only available from one or two suppliers.

Select Spectrum believes census tracts are the appropriate size, as smaller licenses will promote innovation, while encouraging use across the entire coverage area of the license.

Thank you,

James Bridges