



December 28, 2017

VIA ELECTRONIC FILING

Re: Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258

The Wireless Infrastructure Association (WIA) respectfully submits these comments in response to the Notice of Proposed Rulemaking and Order Terminating Petitions (NPRM) in the above-referenced proceeding seeking comment on proposed changes to the rules governing Priority Access Licenses that will be issued in the 3550-3700 MHz band (3.5 GHz Band).¹ WIA applauds the Federal Communications Commission's ("FCC" or "Commission") continued efforts to encourage investment in the Citizens Broadband Radio Service (CBRS). As the FCC accurately notes, "the 3.5 GHz Band will play a significant role as one of the core mid-range bands for 5G network deployments throughout the world."²

A major component to successful and expeditious deployment in the 3.5 GHz Band will be efficient licensing processes. Since the inception of coordination committees in 1986, WIA has processed hundreds of thousands of applications for licenses and coordinated more of the nation's spectrum than virtually any other coordinating committee. Based on WIA's extensive frequency coordination experience, we suggest in these comments that the FCC update its license filing mechanisms to permit batch licensing for 3.5 GHz Band licensees.

Access to CBRS spectrum appeals to critical infrastructure entities (such as public utilities) and independent internet service providers. These entities have been among the early participants and beneficiaries of the still evolving service. Their benefit has been primarily in the 3.65 to 3.7 GHz region of the band where General Authorized Access is available. If they have a nationwide license in the 3.65 GHz Radio Service, they are able to register new links to expand their reach. There are close to 2800 active, granted licenses in the 3.65 GHz to 3.7 GHz region of the band. During the calendar year spanning September 1, 2016 to September 29, 2017, there were

¹ Promoting Investment in the 3550-3700 MHz Band, Notice of Proposed Rulemaking and Order Terminating Petitions, GN Docket No. 17-258 (rel. Oct. 24, 2017) (3.5 GHz Band NPRM).

² 3.5 GHz Band NPRM ¶ 2 (citing T-Mobile Reply Comments at 3-4 ("Circumstances have changed since the Commission initiated [the 3.5 GHz proceeding] in 2012. International focus on 5G spectrum has shifted to mid-band spectrum with the 3.5 GHz band in the spotlight."))

approximately 12,000 link registrations filed through the FCC's Universal Licensing System (ULS). The average number of new link registrations over the past five years is approximately 12,000. Apart from an upward spike in 2014, the market has been very consistent. Per current ULS filing procedures, each of these registrations was "interactively" (meaning individually) filed by various companies or their contact representatives. Interactive filing in the current ULS can be a tedious and time-consuming effort. It is especially inefficient when one entity files a high volume of registrations.

To best promote expedited licensing in the 3.5 GHz Band, the FCC should update ULS to permit batch filing. WIA's objective is to electronically batch file 3.65 GHz link registrations for eligible CBRS licensees. The current link registration filing process requires the registrant to file the FCC Form 601 Main Form and a Form 601 Schedule M interactively. While the Form 601 Main Form can be submitted to the Commission via the batch filing process, Form 601 Schedule M cannot be submitted to the Commission via the batch filing process.

WIA's suggested improvement to ULS would be beneficial to licensees as WIA will provide an efficient process for receiving and entering link registration application data and filing the applications to the Commission.

Last year, the FCC announced its efforts to modernize ULS,³ and this month the FCC announced upgrades to the ULS Geosearch for site-based licenses.⁴ WIA encourages the Commission to continue its ULS modernization efforts by permitting batch filing of 3.5 GHz Band license registrations. ULS documentation for batch filing Schedule M currently exists, demonstrating a possible path forward for batch filing Schedule M with the 601 Main Form. WIA is willing to provide input and expertise as the FCC works to build an electronic batch filing process for 3.65 GHz link registrations.

³ Jon Wilkins & Rear Admiral (Ret.) David Simpson, Modernizing Wireless Licensing at the FCC, FCC Blog (May 13, 2016), <https://www.fcc.gov/news-events/blog/2016/05/13/modernizing-wireless-licensing-fcc>.

⁴ Diane Dupert, WTB Enhances the ULS Site-Based License Search, FCC Blog (Dec. 20, 2017), <https://www.fcc.gov/news-events/blog/2017/12/20/wtb-enhances-uls-site-based-license-search>.

Upgrading the ULS filing system to accommodate batch filing will save registrants time and resources expended on the current ULS interactive link registration's filing procedure. Adopting this new methodology will also benefit the FCC by providing an efficient means of registering CBRS links and, in so doing, promote a more rapid deployment of 5G, Internet of Things and rural broadband. The lessons learned from this modernization effort may serve as a launchpad for providing other wireless radio services with the benefits of efficient batch filing.

WIA appreciates the FCC's attention to this important matter and looks forward to continuing to work with the FCC to spur broadband deployment.

Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Don Andrew

Don Andrew

Director, Frequency Coordination Services

Wireless Infrastructure Association

500 Montgomery Street, Suite 500

Alexandria, VA 22314

/s/ Sade Oshinubi

Sade Oshinubi

Government Affairs Counsel

Wireless Infrastructure Association

500 Montgomery Street, Suite 500

Alexandria, VA 22314