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October 28, 2015

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

Re: *Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands – WT Docket No. 03-66 – NOTICE OF ORAL EX PARTE PRESENTATION*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's Rules to report that on October 27, 2015, on behalf of the National EBS Association (NEBSA), Dr. Patrick Gossman, Deputy CIO for Community Research and Special Projects at Wayne State University and a member of the Board of Directors of NEBSA, had conversations with Chairman Wheeler and Commissioner Clyburn regarding the subject of the referenced proceeding. The conversations took place at the Broadband Inclusion Roundtable held at the Henry Ford Innovation Institute in Detroit. During the conversations, Dr. Gossman urged the FCC to move forward on licensing currently unlicensed Educational Broadband Service ("EBS") spectrum. Dr. Gossman also provided the attached talking points to Chairman Wheeler.

Pursuant to Sections 1.1206(b) (2) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned counsel for NEBSA.

Respectfully submitted,

A handwritten signature in blue ink that reads "Todd D. Gray". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Todd D. Gray  
Counsel, National EBS Association

cc: Chairman Wheeler  
Commissioner Clyburn

## **EBS and FCC – Wearing my NEBSA hat**

Rural adoption lags urban adoption

Less competition, in some cases, no services whatsoever as rural is sparsely populated.

Costs of running cable high. Wireless buildout focused on cities.

FCC could help by moving forward on EBS licensing, the Educational Broadband Service, licensed spectrum from 2.5 to 2.7 GHz. EBS accounts for 117.5 MHz in this space, and much of rural areas are sit fallow. (436 counties do not have any EBS spectrum licensed, more than 1,200 counties with available EBS spectrum) For MI, 11 counties without any, 42 with available)

No EBS licensing for over 20 years.....

Broad consensus proposal submitted to FCC in 2014 along with suggested rules to help the FCC with the difficult task of pleasing multiple constituencies.

Presentation to Roger Sherman and others in the Wireless Bureau July 14 about the benefit of moving forward on EBS for education.

Movement on EBS also of high interest WISPs (more than 1,800 now), who generally start out with unlicensed spectrum but encounter problems with interference as they attempt to grow. Most are small, but a few are quite large. Eg. RISE Broadband which is in 16 states.

Understand many priorities facing FCC, but suggest that fast tracking EBS licensing to educators across the U.S. will have the fastest and most immediate impact on rural communities. This opens the door for educators to build their own network as NMU has done, or for partnerships with WISPs.