



August 15, 2019

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Notice of Ex Parte Communication, GN Docket No. 18-122

Dear Ms. Dortch:

On Tuesday, August 13, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) met with Umair Javed from Commissioner Rosenworcel’s office and on August 15, met with Erin McGrath from Commissioner O’Rielly’s office and Will Adams from Commissioner Carr’s office to discuss matters in the above-referenced proceedings.

NTCA discussed its concerns regarding the proposed reallocation of the spectrum and a potential private market transfer of spectrum. It was pointed out that the Commission has sought comment on several industry proposals, but the proposals are at odds with each other and there is no current consensus or basic understanding about which parts of each of the various proposals the Commission might act on. NTCA encourages the Commission to seek further comment on a specific set of proposed rules so that the industry has adequate notice and the opportunity to comment on them.

NTCA expressed its concern with private parties or current license holders with a financial incentive to work with the largest, most well-financed providers directing the transition to terrestrial use and the spectrum licensing process. NTCA emphasized that its members are interested in mid-band spectrum opportunities and it is important that all interested parties are afforded a fair opportunity to acquire mid-band spectrum at reasonable prices. The licensing rules for any cleared spectrum should reflect the requirements and intent of the Communications Act of 1934, including 47 U.S.C. § 309(j), which tells the Commission that it must avoid excessive concentration of licenses and disseminate licenses among a wide variety of applicants, including small businesses and rural telephone companies. NTCA urged the Commission to adopt cellular market area or county-sized license territories as the geographic area by which future licenses would be awarded. Smaller than Partial Economic Area (PEA)-sized license territories help ensure that small and rural providers have the opportunity to obtain spectrum and that rural consumers will receive service.

Finally, NTCA express support for the joint proposal of ACA Connects – America’s Communications Association, Competitive Carriers Association and Charter Communications, Inc.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Jill Canfield

Jill Canfield

Vice President of Legal

cc: Umair Javed
Erin McGrath
Will Adams