



June 19, 2018

Ex Parte Notice
Via Electronic Filing

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

Re: *Ex Parte Notice: Promoting Investment in the 3550-3700 MHz Band –*
GN Docket No. 17-258

Dear Ms. Dortch:

On June 18, 2018, Jill Canfield, Vice President of Legal and Industry and Assistant General Counsel for NTCA – The Rural Broadband Association (“NTCA”) spoke via telephone with Erin McGrath, Legal Advisor to Commissioner O’Rielly, regarding the Commission’s pending Notice of Proposed Rulemaking on the licensing of Priority Access Licenses (“PALs”) in the 3.5 GHz Citizens Broadband Radio Service (“CBRS”) band.¹

During this call Ms. Canfield expressed NTCA’s appreciation for Commissioner O’Rielly’s leadership and willingness to engage on the issue of license size territories for the upcoming CBRS auction. She discussed NTCA’s members’ interest in using the spectrum band to offer both fixed and mobile broadband service to rural consumers.

Various proposals for the CBRS spectrum have been discussed that involve differing license size territories based on whether the territory is metropolitan or rural. One proposal would have metropolitan cellular market areas auctioned according to metropolitan statistical areas and rural cellular market areas auctioned according to counties.² A coalition, of which NTCA is a part, proposed auctioning the rural cellular markets according to a combination of

¹ See *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking and Order Terminating Petitions, 32 FCC Rcd 8071 (2017) (“*NPRM*”).

² Letter to Marlene H. Dortch, FCC Secretary, from Rebecca Murphy Thompson, CCA, and Scott K. Bergmann, CTIA, GN Docket No. 17-258 (Apr. 20, 2018).

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counties and census tracts.³ NTCA indicated its primary concern is to ensure that all territory that has historically been auctioned as rural statistical areas (“RSAs”) be auctioned according to the smaller license territories in the CBRS auction, in order to provide small, rural providers with a reasonable opportunity to obtain spectrum and to promote more effective use of spectrum for actual service delivery in rural areas.

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 with ECFS.

Respectfully Submitted,

/s/ Jill Canfield

Jill Canfield

Vice President of Legal & Industry

Assistant General Counsel

NTCA–The Rural Broadband Association

cc: Erin McGrath

³ Letter to Marlene H. Dortch, FCC Secretary, from company and trade association representatives, GN Docket No, 17-258 (March 29, 2018).