February 21, 2020

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re:  Ex Parte Presentation, Auction of Priority Access Licenses for the 3550-3650 MHz Band, AU Docket No. 19-244

Dear Ms. Dortch:

As the Commission is well aware, moving forward with an auction of 350 megahertz of mid-band spectrum this year is a key component of ensuring the U.S. remains competitive in the development and deployment of next-generation wireless services. CTIA therefore applauds the Commission for scheduling a vote on the final procedures for the 3.5 GHz Citizens Broadband Radio Service (“CBRS”) auction at its February Open Meeting.\(^1\) The Commission should move forward with deliberate speed to bring the licensed tier of this spectrum to market this year.

CTIA appreciates the Commission’s continued dedication to making the CBRS band a reality. This effort is the culmination of years of hard work by Commission staff, the National Telecommunications and Information Administration (“NTIA”), other federal partners, and industry stakeholders, resulting just last month in the authorization of Spectrum Access System (“SAS”) administrators for full scale commercial deployment—delivering on the full potential of

General Authorized Access spectrum.\(^2\) And, with this Commission vote on bidding procedures for the Priority Access Licenses ("PALs") and the auction to be held in June, the 3.5 GHz band is officially primed for commercial deployment.

In moving forward with effective and efficient PAL licensing, CTIA urges the Commission to make targeted modifications to the Draft Procedures PN. As the Commission always does in its auction procedures, the Draft Procedures PN strives to provide prospective bidders with information concerning incumbency and sharing issues along with reminders concerning the need to conduct due diligence before bidding in an auction.\(^3\) To better ensure potential auction participants can make informed bidding decisions, CTIA suggests that the Commission add to that section of the Draft Procedures PN two specific points. First, although the Commission has certified Environmental Sensing Capability ("ESC") operators, there may be some counties within Dynamic Protection Areas where ESC operators have not deployed, and without ESC coverage the PALs will not be open for deployment. Second, while much information regarding the potential for license impairments due to static or dynamic protection requirements is available via the NTIA website, the Commission should remind prospective applicants that some impairment information—including, for instance, information regarding protection of ESC locations, which may impact CBSD operational parameters—may only be available to SAS providers or ESC operators.

In addition, CTIA urges the Commission to prioritize the rapid review of long-form applications following the conclusion of the auction. The sooner licenses are granted, the sooner licensed mid-band spectrum can be put to use for the benefit of American consumers.

Pursuant to Section 1.1206 of the Commission’s rules, this notice is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Kara Graves
Kara Graves
Assistant Vice President, Regulatory Affairs

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\(^3\) Draft Procedures PN ¶¶ 104-120.