



August 30, 2019

By ECFS

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

Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122

Dear Ms. Dortch:

On August 28, 2019, Ross J. Lieberman, ACA Connects – America’s Communications Association (“ACA Connects”); Alexi Maltas, Competitive Carriers Association (“CCA”); Colleen King, Charter Communications, Inc. (“Charter”); and Howard Symons, counsel to Charter, met with Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly, regarding the above-referenced proceeding.

At the meeting, our coalition of competitive and rural cable and wireless companies reiterated that mid-band spectrum is vital to unleashing the power and promise of 5G, and underscored that how this spectrum is reallocated will have significant impact on our nation’s wireless and broadband future. We explained that our “5G Plus” solution¹ increases broadband deployment by deploying substantial amounts of fiber throughout the country, including in rural areas. We also discussed how the 5G Plus plan (1) makes available more critical 5G spectrum faster than other current proposals; (2) future-proofs the delivery of enhanced pay television programming (including 8K) by transitioning it to fiber delivery; (3) uses auction proceeds to pay for that fiber use and deployment and makes whole incumbents (including satellite companies); and (4) contributes billions of dollars to the U.S. Treasury.

Participants in the meeting praised the Commission for its focus on closing the digital divide and all its efforts to address this matter. We emphasized that the 5G Plus Plan would advance the Commission’s objectives in this area by investing billions of dollars to deploy 120,000 new route miles of fiber with a capacity to deliver 10 Gbps broadband service to homes and businesses. All of this new fiber will be deployed in areas where there is no fiber, or no redundant fiber. This infrastructure and increased fiber capacity is critical to support accelerated deployment of 5G small

¹ See Letter from Ross Lieberman, ACA Connects – America’s Communications Association, Alexi Maltas, Competitive Carriers Association, and Elizabeth Andriou, Charter Communications, Inc., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (July 2, 2019).

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cells, increased Internet reliability, and ultra-fast broadband benefits including enablement of smart grid and smart metering applications. Importantly, it provides an economically viable solution to providing access to high-speed broadband to some underserved locations including those in rural areas.

ACA Connects also discussed the study that it commissioned and previously filed with the FCC, illustrating that at least 370 megahertz of C-band spectrum can be cleared in an expedited timeframe for use by next-generation wireless services while deploying fiber, making whole and incentivizing stakeholders, and benefiting the public.²

Respectfully submitted,

/s/

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cc (via email): Erin McGrath

² See Letter from Ross Lieberman, ACA Connects – America's Communications Association, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (July 15, 2019).