

March 29, 2018

VIA ELECTRONIC FILING

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

Re: GN Docket No. 17-258

***Ex Parte* Presentation**

Dear Ms. Dortch:

The Enterprise Wireless Alliance (“EWA”) wishes to reaffirm its position, the position previously adopted by the Commission, that census tracts are the optimal size for PAL licenses in the 3.5 GHz CBRS band. As EWA stated in its Comments in this proceeding:

The PAL license option is of particular interest to entities with operating areas that are not well aligned with the relatively large geographic licenses typically issued in an auction process, and whose use cases require greater protection than is available on unlicensed spectrum.

It explained:

Extensive experience with geographic licensing and its partitioning/disaggregation opportunities has demonstrated one thing: When needed to address their operating requirements, major commercial operators are able to assemble the requisite geography and spectrum through acquisition, while partitioning and/or disaggregation to meet the needs of smaller licensees, both private and commercial, has proven markedly less successful. The record in response to the Petitions confirms that most commenters – with the exception of the largest commercial carriers and their vendors – oppose larger PAL areas for just this reason.

The March 12, 2018 *ex parte* letter filed by the “CII entities,” including organizations and companies such as EEI, UTC, Southern Linc, and GE that that represent the private enterprise user community, provides compelling support for census tract licensing. It states:

With census-tract licensing in the CBRS band, CII entities will be able to bid vigorously at auction for thousands of census tract licenses to gain localized spectrum access that aligns with their geographically targeted deployment plans...;

and

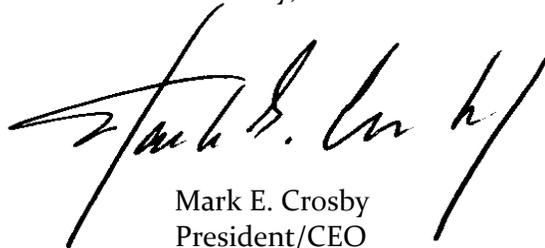
...the FCC should not forego this unique opportunity for U.S. economic and spectrum policy to generate enormous economic benefits in the industrial/CII sphere.

EWA is in full agreement with this position and urges the Commission to reaffirm its original, innovative licensing plan for the CBRS, including the size of PAL licenses.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark E. Crosby
President/CEO