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**VIA Electronic Filing**

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

Re: *Notice of Ex Parte Meeting*  
GN Docket No. 18-122

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on February 27, 2019, Bill Tolpegin, Chief Executive Officer of the C-Band Alliance (“CBA”); Preston Padden, Head of Advocacy and Government Relations for the CBA; Gary Epstein, Auctionomics; and Paul Milgrom, Auctionomics (by telephone) (collectively “CBA Representatives”) met with the following FCC staff members: Donald Stockdale, Wireless Telecommunications Bureau (“WTB”); Matthew Pearl, WTB; Blaise Scinto, WTB; Paul Powell, WTB; Becky Schwartz, WTB; Jeffrey Tigner, WTB; Brian Wondrack, WTB; Joyce Jones WTB; Paul Lafontaine, Office of Economics and Analytics (“OEA”), Martha Stancill, OEA; Margaret Weiner, OEA; Eliot Maenner, OEA; Giulia McHenry, OEA; Evan Kwerel, OEA; and Jim Schlichting, International Bureau.

Preston Padden emphasized four key points: (1) only the CBA Market-Based Approach accomplishes the Commission’s twin public interest objectives to quickly repurpose spectrum for 5G and fully protect existing C-band users;<sup>1</sup> (2) the Market-Based Approach is fully consistent with the Communications Act and agency precedent;<sup>2</sup> (3) the satellite operators paid for their spectrum in FCC approved secondary market transactions and have invested billions to provide services to U.S. customers;<sup>3</sup> and (4) anti-competitive objectives drive cable industry and T-Mobile criticism of the CBA plan.<sup>4</sup>

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<sup>1</sup> *Expanding Flexible Use of the 3.7 to 4.2 GHz Band et al.*, Order and Notice of Proposed Rulemaking 33 FCC Rcd 6915, ¶ 2 (2018) (“*NPRM*”).

<sup>2</sup> See Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 18-122 (Feb. 6, 2019).

<sup>3</sup> See Reply Comments of the C-Band Alliance, GN Docket No. 18-122, at 25 (Dec. 7, 2018).

<sup>4</sup> See *id.*, at 41-45.

Bill Tolpegin explained that the CBA is preparing to file a comprehensive auction and transition plan on the record. Paul Milgrom and Gary Epstein described the design objectives for the auction process that Dr. Milgrom is preparing for CBA. Those objectives include:

- Openness;
- Transparency;
- Speed;
- Tailoring the process to the “unique characteristics” of the C-band;<sup>5</sup> and
- Sufficient flexibility to meet the needs of all prospective buyers, including major wireless carriers, cable operators, and smaller rural providers.

The CBA Representatives reviewed several of the alternatives available to meet these design objectives.

Finally, the CBA Representatives discussed the shortcomings of the “refined” proposal from T-Mobile, noting that the proposal suffers from serious legal, technical, and practical flaws.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer D. Hindin  
Jennifer D. Hindin  
*Counsel for the C-Band Alliance*

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<sup>5</sup> NPRM, at ¶ 10.