



Ex Parte Communication, GN Dkt. No. 18-122

May 21, 2019

VIA ELECTRONIC FILING

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

Dear Ms. Dortch:

The C-Band Alliance (CBA) proposal to clear 200 MHz (inclusive of a 20 MHz guard band) of C-band spectrum within 18-36 months of a final FCC order remains the fastest, most efficient way to transition a substantial amount of mid-band spectrum to terrestrial 5G mobile service, while providing uninterrupted service to existing customers. Compared to the alternatives, the CBA's market-driven proposal better internalizes the relevant costs and benefits, especially the benefits of expeditiously making spectrum available for 5G service.

In furtherance of this proposal, this letter sets forth, for consideration by the Commission and industry, additional details of a band plan that the CBA proposes for adoption to transition spectrum to terrestrial 5G operators as part of a voluntary market-based process. This proposed band plan supplements the details previously provided by the CBA on the spectrum clearing aspects of its proposal.¹

As further described in the attached slides, the CBA proposes to repurpose the 3.7-3.9 GHz spectrum through a private auction process based on a "9 x 20" band plan (plus a

¹ See, e.g., Letter from Jennifer Hindin, Counsel to the C-Band Alliance, GN Docket No. 18-122 (Apr. 9, 2019) (describing the CBA's proposed Transition Implementation Process, which provides details regarding technical and logistical interference solutions and proposed spacecraft launch plans and timing); Letter from Henry Gola, Counsel to the C-Band Alliance, GN Docket No. 18-122 (Apr. 3, 2019) (describing the binding customer commitment letters Intelsat and SES sent to their respective customers agreeing to undertake, manage, and complete all necessary actions for customer transition, setting forth an earmark of 120% of the estimated spectrum clearing costs for customer expenses, providing a schedule of transition-related expenses, and detailing technical specifications for an antenna filter); Letter from Jennifer Hindin, Counsel to the C-Band Alliance, GN Docket No. 18-122 (Feb. 12, 2019) (providing transponder migration plans); Letter from Bruce A. Olcott, Counsel for Eutelsat S.A., GN Docket No. 18-22 at Attachment (Apr. 9, 2019)(providing same); Letter from Joseph A. Godles, Counsel for Telesat Canada, GN Docket No. 18-22 at Attachment (Apr. 11, 2019)(providing same).



20 MHz guard band). Pursuant to this plan, the repurposed C-band spectrum would be divided into nine license blocks, each 20 MHz in size, in each partial economic area (PEA) in the Continental United States that would be available for bidding by interested parties, followed by an FCC licensing process to obtain the specific spectrum blocks. This approach would optimize the potential number of bidders in urban and rural areas, with nine blocks available in both large and small markets. From a potential bidder's perspective, this structure is advantageous because it offers enhanced flexibility when deciding how and when to bid. A 9 x 20 band plan is also manageable from an auction process perspective—the blocks are neither so large as to discourage participation from bidders interested in smaller amounts of spectrum, nor so small as to create frustration for bidders interested in aggregating larger amounts of spectrum.²

The CBA has worked with customers, end-users, manufacturers, potential 5G spectrum users and others to flesh out the many complex technical, operational, and logistical issues related to clearing and transitioning 200 MHz of C-band spectrum from satellite service to terrestrial 5G. The proposed band plan—designed to be competition-friendly and to facilitate a transparent auction open to all—is further evidence of these efforts, and the CBA is pleased to submit it for the record. The CBA is continuing to solicit feedback from stakeholders and may adjust the proposed band plan as needed to accommodate new information.

The CBA looks forward to continuing to work with the Commission and stakeholders to achieve the dual goals of rapidly repurposing spectrum for 5G in a transparent and efficient manner while fully protecting the existing programming distribution ecosystem that serves nearly 120 million U.S. households via C-band.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

_____/s/

Bill Tolpegin
Chief Executive Officer

Attachment

² The CBA plans to submit on the record revisions to its proposed technical rules to account for the potential interference risk that would be created should multiple terrestrial operators operate co-frequency in adjacent PEAs.

C-Band Alliance Proposed Band Plan

2019.05.21

C-Band Alliance Membership



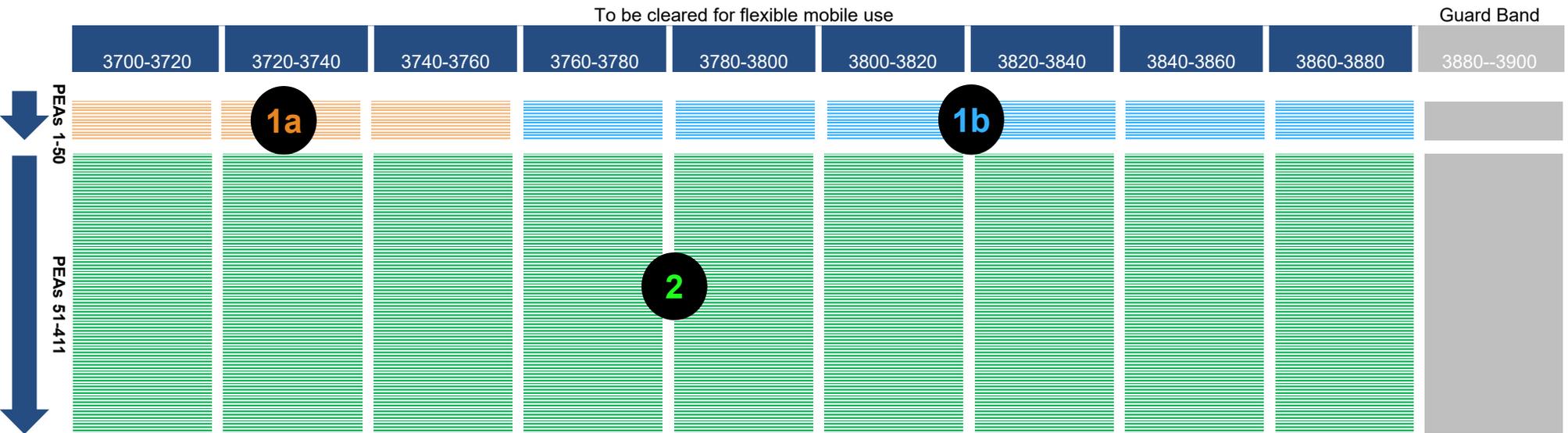
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General Principles

- The CBA is submitting this band plan for consideration by the Commission, which reflects comments by stakeholders.
- The proposed **simple and neutral** CBA Band Plan divides the 180MHz into 9x20MHz per PEA blocks to be cleared for use by flexible mobile operators.
 - ▶ **20 MHz block size** is 3GPP-compatible, can be aggregated to create larger blocks for 5G roll-outs, and facilitates the transition plan because a pair of 20 MHz blocks aligns with a satellite transponder (36 MHz plus a 4 MHz guard band).
 - ▶ **Number of blocks** provides a **fair** opportunity **for all** to acquire rights to C-Band spectrum to support a roll-out of 5G technologies and business plans.
 - ▶ **PEAs** are the right trade-off to balance the goals of (i) providing fair opportunity for small and rural operators; (ii) affording a manageable interference environment; and (iii) managing the complexity of the transaction process.
- 3x20 MHz (**Early Tranche**) blocks can be released in the top PEAs as soon as 18 months from a final FCC Order because clearing this spectrum does not require the launch and operation of additional satellites. The number of PEAs selected in the early tranche is a result of an analysis of registered earth stations and reflects the number of antennas that reasonably can be filtered in 18 months.
- Post-relocation, all incumbent C-Band satellite users will be served by a denser satellite network delivering capacity similar to the planned pre-relocation C-Band satellite fleet, but in the remaining 300 MHz. This 300 MHz band will also protect existing aero altimeter radars.

Proposed Band Plan



1a + **1b** 3x20 MHz in 46 of the top 50 PEAs (*) available within 18 months (“Early Tranche”);
9x20 MHz in 49 of the top 50 PEAs (**) available after 36 months

2 9 x 20 MHz in PEAs 51 to 411 (***) available after 36 months

All tranches, satellite TT&C related exclusions, and related logistics are described in the CBA’s Transition Implementation Filing posted April 9th 2019 <https://www.fcc.gov/ecfs/filing/10409183088602>

(*) Excluding the Baltimore-Washington, Atlanta, Denver and Honolulu PEAs (numbers 5, 11, 20 and 42).

(**) Excluding the Honolulu PEA (number 42)

(***) CONUS-wide, excluding the Honolulu, Anchorage, Kodiak, Fairbanks and Juneau PEAs (numbers 42, 212, 264, 298 and 360)