

April 16, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, and Commissioner Rosenworcel,

We write today regarding your recent Notice of Proposed Rulemaking that proposes to change how licenses are issued in the 3.5 GHz Band. Expanding access to broadband is critical for our rural communities. Access to fast, reliable, and affordable broadband breaks down geographical barriers and allows rural communities to participate in the 21st century economy. The 3.5 GHz band holds great potential for next generation connectivity and for ensuring that America is a leader in 5G and can also provide a cost-effective solution for delivering fixed wireless broadband in rural areas.

We understand that one of the issues the Commission is considering in its proceeding is the size of the geographic areas throughout which the 3.5 GHz band will be licensed. There are arguments to be made for larger licenses to avoid interference and cater to urban areas and arguments to be made for small licenses to laser focus on rural areas. After examining the policy and technical arguments, we believe that there is a path forward to balance the needs of highly populated areas with those of our rural communities.

One way the Commission could meet this challenge is to license spectrum using county-equivalent areas or Cellular Market Areas (CMAs) or a combination thereof. The use of county-equivalent areas will allow rural providers to participate in the 3.5 GHz auction for Priority Access Licenses and further deploy rural broadband service. Further, the Commission has frequently licensed spectrum using CMAs with great success. CMAs are comprised of 306 Metropolitan Statistical Areas (MSAs) that cover the most populated areas of the country and 429 Rural Service Areas (RSAs) that cover the rural parts of the country. The use of MSAs for our urban areas would allow larger carriers to deploy networks without the fear of interference or degradation of their signals. Additionally, a hybrid model of MSAs and county-equivalents could allow for the best penetration and expansion into our rural areas. As many of us have discussed before, a solution that works in the heart of New York City, probably will not work in Treasure County, Montana.

We encourage the Commission to reject the expansion of geographic licensing areas such as large scale Partial Economic Areas (PEAs) and instead work with all stakeholders to come to

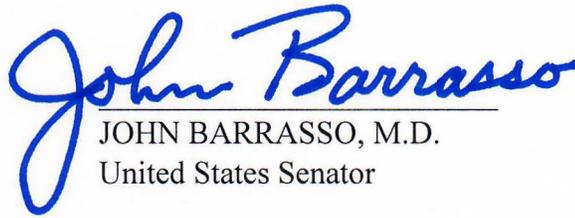
a balanced approach using medium sized license areas. It is important that our rural areas do not get left behind again. We believe these options strike the right balance of interests in this proceeding.

Thank you for your attention to this matter and for your ongoing efforts to expand broadband connectivity across the United States.

Sincerely,



STEVE DAINES
United States Senator



JOHN BARRASSO, M.D.
United States Senator



DAN SULLIVAN
United States Senator