



Federal Communications Commission
Washington, D.C. 20554

December 19, 2025

Columbia Capital
Three Forty-Five Spectrum, LLC
N77 License Co LLC
204 South Union Street
Alexandria, VA 22314
ATTN: Monish Kundra

Jenner & Block LLP
Trey Hanbury
1099 New York Avenue, NW, Suite 900
Washington, D.C. 20001

Re: Reminder of Construction Obligations for Wireless Licensees

Dear Columbia Capital:

The FCC has been clear that wireless licensees are required to put their spectrum to use and meet all applicable buildout obligations. It has also emphasized that deploying spectrum for intensive use promotes the public interest. Accordingly, the Wireless Telecommunications Bureau writes to remind Columbia Capital of its obligation under federal law to comply with buildout milestones for 3.45 GHz licenses that your company or its affiliates hold.

The Commission's 3.45 GHz auction closed in 2022 with net bids exceeding \$22 billion across more than 4,000 licenses. As a condition of holding exclusive rights over this valuable spectrum, licensees must satisfy initial performance benchmarks within four (4) years from the date of the initial license, and final performance benchmarks within eight (8) years.¹ The Bureau reminds you that significant regulatory consequences may attach for failure to comply with the 3.45 GHz benchmarks by the 2026 deadline.

The Commission's buildout obligations help ensure that scarce spectrum resources are put to use and deployed in a timely manner that benefits all communities.² Expeditionary and robust spectrum utilization supports the Commission's statutory mandate to ensure that communication by radio is made "available, so far as possible, to all the people of the United States," including those in rural, remote, and underserved areas.³ Indeed, the Commission has taken, and will continue to take, significant steps to facilitate the rapid deployment of wireless broadband and other services. And while the Commission

¹ See 47 CFR § 27.14(w)(1).

² See 47 U.S.C. § 309.

³ 47 U.S.C. § 151.

works to free up additional spectrum for these services, it must ensure that existing spectrum licenses are used intensively to serve the American people as set forth in the Commission's rules.

Licensees are reminded that construction obligations were in place at the time the license(s) were acquired, whether through auction or the secondary market. Licensees must meet the applicable deadline and file a timely notification of construction with the Bureau no later than 15 days after the construction deadline.⁴ The Commission does not routinely grant waivers or extensions of construction requirements.

Consistent with this longstanding precedent, the Bureau advises you that it does not intend to excuse non-compliance from the company's 3.45 GHz buildout milestones in 2026. The Commission's rules do not contemplate extensions of construction deadlines merely because licensees miscalculated or erroneously predicted economic factors like costs, demand, and developments in the market.⁵ Licensees are expected to account for these considerations when obtaining their license(s). When a licensee fails to deploy service on time, the Commission holds the licensee accountable in accordance with its rules.

The Bureau expects Columbia Capital or its affiliates to review its license authorizations and applicable service rules to ensure it is on track to meet its 2026 construction obligations. Additional information regarding general construction obligations can be found in the Commission's 2017 Public Notice.⁶ Questions regarding specific licenses or filing requirements may be directed to the Bureau through the appropriate licensing support channels.

To help the FCC carry out its responsibilities in overseeing wireless licensees, please respond to this letter within 30 days by providing the Bureau with an update on the following points regarding the covered spectrum licenses: (a) the current status of your builds or deployments, if any; (b) the current status of your use or others' use, if any; and (c) your plans for meeting the upcoming buildout obligation.

Sincerely,

/s/ Joel Taubenblatt
Chief, Wireless Telecommunications Bureau

⁴ 47 CFR 1.946(d).

⁵ See 47 CFR § 1.946(e)(1)–(5).

⁶ See *Wireless Telecommunications Bureau Reminds Wireless Licensees of Construction Obligations*, Public Notice, 32 FCC Rcd 4802 (WTB 2017).