

February 27, 2018

**VIA ELECTRONIC FILING**

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

**Re: *Ex Parte* Communication**

Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz,  
GN Docket 17-183

Dear Ms. Dortch:

On February 27, 2018, Peter Pitsch of Intel Corporation met with Louis Peraertz of Commissioner Clyburn's office. Mr. Pitsch made the following points regarding issues relevant in the above referenced proceeding.

1. Two components of the Intelsat/Intel flexibility proposal are key to its success. First, the eligible FSS satellite operators must be provided flexibility to enable terrestrial mobile use where and when they determine it is appropriate. The flexibility granted to the eligible FSS operators must cover the entire 3.7 to 4.2 GHz band to ensure that market forces will determine the use of the spectrum, up to the full 500 MHz. Second, the eligible FSS operators must agree on a way forward. The recent Intelsat/SES announcement suggests that any "holdout" problem is unlikely.

2. The Commission should expeditiously begin a rulemaking proposing to adopt this flexibility approach. Among other reasons, such FCC action is required to foster 5G development in the U.S. Other countries seeking to be 5G leaders have recognized the importance of this band. For example, Korea has announced it will auction the 3.4-3.7 GHz this June.<sup>1</sup> Similarly, last November, China's Ministry of Industry and Information Technology (MIIT) designated the 3.3-3.6 and 4.8-5.0 GHz bands for 5G use.<sup>2</sup> The three Chinese carriers—China Mobile, China Telecom and China Unicom—are field trialing base stations in several cities this year with pre commercial deployment coming in 2019 and commercial deployment in 2020. China Mobile expects to have deployed more than 10,000 base stations in 2020.<sup>3</sup> Considering that the three Chinese operators will start their large scale trials in these bands in the 2<sup>nd</sup> half of 2018, it is expected that MIIT will finalize the mid-band regulations in the first half of 2018.
3. As set out in the Intelsat/Intel joint pleadings in this proceeding, the current use by thousands of customers and the alternative possible means of accommodating them makes efficient clearing of this band complex. The Intelsat/Intel proposal represents the best means of using available information and incentives to enable terrestrial use where and when it is efficient, while protecting the legitimate interests of the existing users at the lowest possible cost. The alternative approaches put forward in the record would require more difficult FCC determinations as to what use exists, the relative value of competing uses of the band, and which means of accommodating existing users, if any, would be cost-effective. These top-down approaches are much more likely to result in delays.

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<sup>1</sup> <https://www.rcrwireless.com/20180102/5g/korean-carriers-invest-9-billion-in-5g-tag23>

<sup>2</sup> <http://www.miit.gov.cn/n1146285/n1146352/n3054355/n3057735/n3057748/c5907314/content.html>

<sup>3</sup> <http://www.gtigroup.org/Special/5G-INNOVATION-SUMMIT/KEYNOTE-A/2017-09-22/11202.html> and <http://www.lightreading.com/mobile/5g/china-mobile-to-deploy-10000-5g-basestations-by-2020/d/d-id/738307>

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, a copy of this letter is being provided to the above mentioned parties. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Peter K. Pitsch

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Associate General Counsel  
Intel Corporation

Cc:

Louis Peraertz