

EXHIBIT 1

**DESCRIPTION OF TRANSACTION
AND PUBLIC INTEREST STATEMENT**

I. Introduction

As set forth in this FCC Form 608 lease notification, Fixed Wireless Holdings, LLC, Sprint Spectrum Licensee Holder LLC, American Telecasting of Anchorage, LLC, Clearwire Spectrum Holdings, LLC, Clearwire Spectrum Holdings II, LLC, WBSY Licensing, LLC (“Licensees” or “Lessors”) and The Alaska Wireless Network, LLC (“Lessee” or “AWN”) (collectively, the “Parties”) hereby notify the Federal Communications Commission (“Commission” or “FCC”) that they have entered into a Long-Term Spectrum Manager Lease Agreement and Long-Term Spectrum Manager Sublease Agreement (the “Lease Agreements”).¹ Under the Lease Agreements, Lessee is authorized to operate a wireless communications system using various frequencies in the geographic areas (the “Markets” or the “Leased Spectrum”) of the 2.5 GHz licenses specified in Schedule A attached hereto (the “FCC Licenses”).

II. Ownership and Qualifications

The Alaska Wireless Network, LLC (“AWN”), a Delaware Limited Liability Company, is an indirect, wholly-owned subsidiary of its ultimate parent corporation, Liberty Broadband Corporation (“Liberty Broadband”), a Delaware corporation that is widely held and publicly traded (NASDAQ: LBRDA, LBRDK, LBRDP). Liberty Broadband’s wholly-owned subsidiaries include an indirect 100% interest in GCI Holdings LLC (“GCI Holdings”) and a non-controlling interest in Charter Communications Inc. (“Charter”). GCI Holdings LLC offers fixed and mobile wireless services through its subsidiaries GCI Communication Corp., AWN, United Utilities, Inc., United2, LLC, and Unicom, Inc., (collectively, “GCI”). AWN is the licensee of the underlying spectrum over which GCI offers mobile wireless broadband communications services on an affordable basis throughout Alaska. A current FCC Form 602 Ownership Report for AWN is on file with the Commission, which establishes that AWN is legally qualified to hold the subject leased spectrum.² AWN is an existing Commission licensee and previously has been found by the Commission to have the “citizenship, character, financial, technical, and other qualifications” to hold Commission licenses and leases.³

¹ Fixed Wireless Holdings, Sprint Spectrum License Holder LLC, American Telecasting of Anchorage, LLC, Clearwire Spectrum Holdings II LLC and WBSY Licensing, LLC have entered into a Long-Term Spectrum Manager Lease Agreement with AWN, and American Telecasting of Anchorage, LLC, Clearwire Spectrum Holdings, LLC, Clearwire Spectrum Holdings II, LLC and WBSY Licensing, LLC have entered into a Spectrum Manager Sublease Agreement with AWN.

² See, e.g., ULS File No. 0009837244.

³ *Application of The Alaska Wireless Network, LLC, and T-Mobile License LLC for Consent to Assign License*, WT Docket No. 15-265, Memorandum Opinion and Order, DA 16-507, ¶ 7 (WTB 2016) (“AWN/T-Mobile Order”); see also *Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc. and Unicom, Inc. For Consent To Assign Licenses to The* (continued...)

Lessors are subsidiaries of T-Mobile USA, Inc. (“T-Mobile USA”) and, indirectly, T-Mobile US, Inc. (“T-Mobile US”), a publicly-traded company and part of the family of companies that operate under the T-Mobile® brand names. Deutsche Telekom AG (“DT”), a publicly-traded German company based in Bonn, Germany, holds approximately a 46.8 percent interest in T-Mobile US through its wholly-owned subsidiary T-Mobile Global Zwischenholding GmbH (“T-Mobile Global”). This subsidiary owns all of the equity and voting interests of T-Mobile Global Holding GmbH (“T-Mobile Holding”), which owns all of the equity and voting interests of Deutsche Telekom Holding B.V. (“DT Holding B.V.”), which in turn holds the approximately 46.8 percent interest in T-Mobile US. DT has *de facto* control of T-Mobile US – and thus Lessors – as a result of a proxy agreement which authorizes DT to vote a majority of the stock of T-Mobile US.

Led by a management team with decades of collective experience in the telecommunications industry, T-Mobile US is headquartered in Bellevue, Washington, offers nationwide wireless voice and data services to consumer and business customers and provides service to 106.9 million customers.⁴ The Commission has repeatedly found that Lessors and its controlling companies have the requisite character and qualifications to hold Commission authorizations.⁵ An FCC Form 602 providing current ownership information for Lessors is on file with the Commission.⁶

III. Description of Transaction

On December 15, 2021, Lessors and Lessee entered into the Lease Agreements in order to (i) grant Lessee the right to use the Leased Spectrum and thus expedite the deployment of the spectrum and the resulting public interest benefits; and (ii) memorialize the respective rights and responsibilities of Lessors and Lessee with respect to the Leased Spectrum consistent with the Communications Act of 1934, as amended, and the rules, regulations and policies of the FCC (the “Communications Laws”) and the terms and conditions set forth herein.

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Alaska Wireless Network, LLC, Memorandum Opinion and Order and Declaratory Ruling, 28 FCC Rcd 10433 (2013) (approving the GCI/ACS applications to assign licenses to AWN) (“AWN Order”).

⁴ See T-Mobile Investors, News & Events, November 2, 2021, found on the T-Mobile website at the following link: <https://investor.t-mobile.com/news-and-events/t-mobile-us-press-releases/press-release-details/2021/T-Mobile-Delivers-Industry-Leading-Growth-in-Postpaid-Service-Revenues-Postpaid-Customers-and-Cash-Flow-in-Q3/default.aspx> (last visited November 12, 2021).

⁵ See, e.g., *Applications of T-Mobile US, Inc. and Sprint Corporation for Consent to Transfer Control of License and Authorizations*, WT Docket No. 18-197, Memorandum Opinion and Order, Declaratory Ruling, and Order of Proposed Modification, FCC 19-103, ¶ 44 (rel. Nov. 5, 2019) (“*Merger Approval Order*”); *Applications of Deutsche Telekom AG, T-Mobile USA, Inc., and MetroPCS Communications, Inc. for Consent to Transfer of Control of Licenses and Authorizations*, Memorandum Opinion and Order and Declaratory Ruling, 28 FCC Rcd 2322, 2330, ¶ 19 (WTB/IB 2013); *Applications of T-Mobile USA, Inc. and SunCom Wireless Holdings, Inc.*, Memorandum Opinion and Order, 23 FCC Rcd 2515, 2519-20 ¶ 10 (2008).

⁶ See FCC File No. 0009825022.

The spectrum leasing and subleasing arrangements notified here will commence twenty-one (21) days following the filing of the Form 608s with the Commission. These arrangements will continue in effect until December 31, 2029. Consistent with the Lease Agreements and the requirements of the Communications Laws, Lessors, whose qualifications and eligibility as a licensee are matters of Commission record, will retain *de facto* and *de jure* control of the Leased Spectrum in connection with the leasing agreement⁷ throughout the lease term. Lessee, whose qualifications and eligibility also are matters of Commission record, will conduct operations under the Lease Agreements subject to applicable rules and regulations.

The leasing and subleasing arrangements under the Lease Agreements do not raise competitive or other public interest concerns.⁸ As discussed in further detail below, the spectrum aggregation of Lessee following the commencement of the instant leasing and subleasing arrangements will not be anti-competitive. There is significant competition in Alaska, with numerous providers – including all of the nationwide providers – having access to significant spectrum resources. More importantly, immediate access to this spectrum will promote Lessee’s 5G deployment, an important public interest benefit.

No competitive harm will result by the proposed leasing and subleasing arrangements, because Lessors are not currently providing their own services to end-user customers on the Leased Spectrum. Thus, there will be no discontinuance, reduction, loss, or impairment of service to end-user customers, and no loss of an existing service provider in any Market. The lease will enable GCI to put to prompt use spectrum that Lessors are currently not utilizing to provide service to end-user customers and will not be ready to deploy for some time. Instead of the spectrum laying fallow, the lease arrangements will enable these frequencies to be used to facilitate the rapid deployment of GCI’s own 5G network and thus provide improved and expanded wireless service to American consumers. Both the Commission and the Department of Justice have emphasized the benefits of putting underutilized spectrum to use.⁹

⁷ *Policies Regarding Mobile Spectrum Holdings*, Report & Order, 29 FCC Rcd 6133 at ¶ 197 (2014) (“*Mobile Spectrum Holdings Order*”). In the instance of the sublease arrangements, the licensee of the FCC License will maintain *de jure* control, while Lessors will hold *de facto* control.

⁸ Lessee was already leasing or subleasing between 40 and 49 MHz of Lessors’ 2.5 GHz spectrum across Alaska prior to the instant transaction, and providing service over such spectrum as well. The Lease Agreements entered into pursuant to this transaction will replace all existing 2.5 GHz leases and subleases between T-Mobile and AWN.

⁹ See, e.g., *Merger Approval Order*, ¶ 12 (approving DISH’s acquisition of Boost Mobile because it would allow DISH to deploy its spectrum holdings, “*which for many years have been underutilized*”); *In the Matter of Expanding Flexible Use in the 3.7-4.2 GHz Band*, Report and Order, Order Proposing Modification, 35 FCC Rcd 2343, ¶¶ 1, 135 (2018) (repurposing underutilized C-band spectrum for commercial, flexible licenses “so that entrepreneurs and engineers can put this resource to its highest and best use”); *In the Matter of Use of the 5.850-5.925 GHz Band*, Notice of Proposed Rulemaking, 34 FCC Rcd 12603, ¶ 18 (2019) (proposing to permit unlicensed devices to share spectrum in the 5.9 GHz band with Dedicated Short Range Communications (DSRC) because “DSRC has not lived up to its promise of achieving the [Intelligent Transportation Systems] goals, leaving valuable mid-band

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The leasing and subleasing arrangements will yield significant public interest benefits. By providing immediate access to the Leased Spectrum, the leasing and subleasing arrangements will allow GCI to further implement its 5G deployment plan, in order to provide 5G services and enhanced LTE service to consumers in Alaska. The Leased Spectrum will allow GCI to deploy its 5G network more broadly and robustly than is currently possible using its existing spectrum holdings in the Markets. GCI was the first carrier to launch 5G service in Alaska.¹⁰ GCI was able to deliver the first standards-based 5G network to Anchorage, and improved 4G LTE speeds for all GCI wireless customers within Anchorage.¹¹

GCI is coupling the full capacity of this spectrum with its other spectrum assets to provide a superior wireless experience to its customers. The Commission has recognized “that holding a mix of spectrum bands is advantageous to providers and that consumers benefit when multiple providers have access to a mix of bands.”¹² GCI will leverage its experience with the deployment of 5G in Anchorage, and the combined 600 MHz and 2.5 GHz spectrum assets of GCI and T-Mobile, to create multiple layers for 5G New Radio (“NR”) deployment as GCI continues its 5G rollout for subscribers and in-bound roamers, including T-Mobile’s customers. This will result in greater speeds and greater coverage for consumers in Alaska.

The benefits of 5G are manifold. In addition to faster speeds, 5G service will support innovative consumer and business applications, including IoT (Internet of Things), smart cities, connected vehicles and eHealth.¹³ The advances enabled by 5G will transform the way Alaskans live, work, travel, and play by facilitating an enormous variety of IoT applications and the full range of connected devices.

More broadly, consumer demand for mobile broadband is growing at an unprecedented rate, and Lessee’s use of the Leased Spectrum will augment its ability to satisfy this growing demand in the important Markets covered by the Leased Spectrum.¹⁴ For example, Cisco reports that U.S. mobile data traffic grew 71 percent in 2017,¹⁵ and Cisco projects that U.S. mobile data traffic will grow 7-

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spectrum largely fallow”); Competitive Impact Statement at 2-3, *United States v. Deutsche Telekom, et al.*, No. 19-cv-2232 (D.D.C., July 30, 2020).

¹⁰ Bevin Fletcher, *GCI Turns on Alaska’s First 5G Service*, FIERCEWIRELESS (Apr. 20, 2020), <https://www.fiercewireless.com/5g/gci-turns-alaska-s-first-5g-service>.

¹¹ *GCI on Track to Complete Buildout of Nation’s Northernmost 5G Network*, GCI (May 1, 2020), <https://www.gci.com/about/newsreleases/gci-hometown-5g-buildout-on-track>.

¹² *Mobile Spectrum Holdings Order* ¶ 59 (2014).

¹³ Bevin Fletcher, *GCI Turns on Alaska’s First 5G Service*, FIERCEWIRELESS (Apr. 20, 2020), <https://www.fiercewireless.com/5g/gci-turns-alaska-s-first-5g-service>.

¹⁴ See, e.g., *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993; Annual Report and Analysis of Competitive Market Conditions with Respect to Mobile Wireless, Including Commercial Mobile Services*, Seventeenth Report, 29 FCC Rcd 15311, 15356 ¶ 91 (WTB

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fold from 2017 to 2022.¹⁶ GCI will use the additional 2.5 GHz spectrum to meet this growing demand by significantly increasing the capacity of its network. The additional spectrum will also enable added capacity and improved data throughput speeds, helping improve network reliability and coverage in the Markets.

The advent of 5G NR technology now enables carriers in excess of 20 MHz in bandwidth. The standards and implementations for NR support of 2.5 GHz allows a single carrier to support up to 100 MHz. This increased width allows for great efficiencies on both the part of the terminal and the network. This bandwidth efficiency will be expanded even further with the deployment of massive MIMO, providing GCI yet another tool to meeting the consumer demand for data. Access to a wide mid-band carrier will be critically important in allowing GCI to efficiently respond to increasing demands for data services.

This additional 2.5 GHz spectrum will be particularly beneficial for deployment in Alaska because providing wireless service to Alaska presents unique challenges. First, communities are separated by great distances – mostly unconnected by roads. Alaska is the largest state in America, with a vast territory and numerous small, remote communities. According to 2010 U.S. Census data, Alaska has the lowest population density of any state in the United States, with only 1.2 people per square mile statewide.¹⁷ In contrast, the second least dense state, Wyoming, is nearly 5 times as dense, with a statewide population density of 5.8 people per square mile. This translates into steeper build-out costs for carriers that seek to serve Alaskans – especially rural Alaskans – and, thus, higher costs for Alaskan consumers. This dynamic also threatens to magnify the existing digital divide between rural Alaskans and those living in metropolitan Alaskan areas. Second, climate, geography, and government land-ownership complexities often hamper infrastructure deployment and operation in Alaska. The already challenging build-out conditions are exacerbated by the extreme Alaskan weather, which significantly limits construction to a few months each year (the shortest construction season in the United States).

The very distance, climate, and geography characteristics that make it so uniquely difficult to provide wireless service also make reliable mobile service so crucial to the safety and livelihoods of Alaskans every day. GCI aims to bring Alaskans the best wireless service to the most people and in the most communities possible. To achieve this goal, GCI puts new spectrum resources to work for its customers whenever the addition of spectrum will expand or improve its network.

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2014) (“Rising consumer demand for mobile broadband is increasing service providers’ need for spectrum at an unprecedented rate.”).

¹⁵ Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2017-2022, White Paper, CISCO, *available at* <https://s3.amazonaws.com/media.mediapost.com/uploads/CiscoForecast.pdf> (last visited Dec. 2, 2021).

¹⁶ *Id.*

¹⁷ Alaska ranks 52 out of 52 states and territories in population density (this ranking includes Puerto Rico and Washington D.C.). *See Historical Population Density Data (1910-2020)*, U.S. CENSUS BUREAU, <https://www.census.gov/data/tables/time-series/dec/density-data-text.html> (last visited Dec. 2, 2021).

Leasing and subleasing of the FCC Licenses is an important part of this effort. These leasing and subleasing arrangements will enhance GCI's ability to increase capacity for consumers in Alaska more effectively, especially in underserved and rural communities – and also allow roaming customers to expand their ability to use mobile broadband services. Because of GCI's longstanding familiarity with the unique demands of the Alaskan marketplace and environment, its deep resources in Alaska, and its understanding of the needs to Alaskans, GCI will ensure that the FCC Licenses are deployed quickly and efficiently for these customers.

V. Spectrum Aggregation and Competition Analysis

As noted above, the leasing and subleasing arrangements will promote competition within Alaska, and are in the public interest. The leasing arrangements do not raise spectrum aggregation or competitive concerns. While the proposed leasing and subleasing arrangements will cause GCI either to trigger or to increase its overage above the spectrum screen in certain areas, the screen is not a finding of competitive harm but merely a processing tool for identifying situations in which competitive concerns could arise.¹⁸ The Commission has repeatedly found that spectrum leases or acquisitions exceeding the screen are pro-competitive and in the public interest where the spectrum would facilitate the build-out of next generation networks, improve service to customers and put fallow spectrum to use.¹⁹

Post-transaction, Lessee's overall spectrum holdings will meet, or exceed, the overall spectrum screen of 250 MHz²⁰ in certain areas across Alaska. However, due to the CGSA configuration of Lessee's cellular holdings, AWN does not hold cellular spectrum across the entirety of any Alaskan

¹⁸ The Parties have provided a matrix detailing the spectrum aggregation resulting from the spectrum lease on a borough-by-borough basis as Exhibit 2. The Parties have also provided a chart of competitors holding low- mid-band and mmW spectrum as Exhibit 3.

¹⁹ See *Merger Approval Order*, ¶ 97 (recognizing that although the transaction would trigger the spectrum screen, "America's appetite for wireless broadband service is surging" and "[e]nabling next generation wireless networks and closing the digital divide will require efficient utilization of the low-, mid- and high-bands."); *Applications of AT&T Mobility Spectrum LLC, New Cingular Wireless PCS, LLC, Comcast Corporation, Horizon Wi-Com, LLC, NextWave Wireless, Inc., And San Diego Gas & Electric Company for Consent to Assign and Transfer Licenses*, Memorandum Opinion and Order, 27 FCC Rcd 16459, ¶ 40 (2012) (finding that, although the spectrum screen was triggered in 10 markets, divestitures were not warranted and that the merger would yield significant public interest benefits, including "facilitat[ion of] the transition of long-underutilized WCS spectrum towards mobile broadband use."); *Sprint Nextel Corporation and Clearwire Corporation*, Memorandum Opinion and Order, 23 FCC Rcd 17570, ¶ 27 (2008) (finding that, although the spectrum screen was triggered in 43 markets, divestitures were not warranted and that the merger would yield significant public interest benefits, including the "deploy[ment of] . . . next-generation technology networks based on WiMAX standards.").

²⁰ See *Merger Approval Order* at ¶ 228 ("the revised amount of spectrum available would be 743 megahertz, with an associated trigger of 250 megahertz"). The overall spectrum screen in the Lower 48 of 350 MHz is considerably higher than in Alaska, due to the inclusion of C-Band (280 MHz) which currently is unavailable for mobile wireless use in Alaska.

community, and in many cases, only covers a small geographic area with cellular spectrum. The benefits of providing critical wireless services, including 5G service, to rural Alaskans in these areas greatly outweigh any speculative harm associated with these spectrum concentration levels in excess of the spectrum screen.²¹ Furthermore, the number of facilities-based competitors in the Markets will not be reduced by this leasing and subleasing arrangement. T-Mobile currently is not providing its own facilities-based service over the FCC Licenses and GCI is already leasing portions of the FCC Licenses. This additional spectrum that will be newly leased by GCI will therefore be put to productive use to the benefit of Alaskan customers and consumers traveling to Alaska. Thus, the leasing and subleasing arrangements will not reduce competition and will instead benefit consumers.

Regarding the overall spectrum screen, the Commission has noted that “given spectrum holdings of rival service providers, including mmW spectrum, as well as spectrum coming online in the near future, we find it unlikely that rival service providers or potential entrants would be foreclosed from expanding capacity, deployment mobile broadband technologies, or entering the market. . .”²² That conclusion applies equally if not more to the instant leasing and subleasing arrangements, in which Lessee will have access to, post-transaction, less spectrum than what has been previously approved by the FCC in other transactions, as well as less than other providers in the Markets which have significant access to spectrum. This leasing and subleasing arrangement promotes, rather than thwarts, the FCC’s objectives underpinning FCC’s broader spectrum policies alike. Moreover, both AT&T and Verizon have significant market shares in both the urban and rural areas of Alaska, and hold a significant amount of spectrum that is suitable and available for mobile use.

In the Wireless Telecommunications Bureau and Office of Economics and Analytics (collectively, the “Bureaus”) recent Auction 107 Order, the Bureaus set forth a number of circumstances that allowed Verizon and T-Mobile to exceed the spectrum screen – in some cases by over 75 MHz.²³ The Bureaus noted that in all of the markets where Verizon and T-Mobile exceeded the spectrum screen, there were at least four licensees that had access to both low-band and mid-band spectrum, with

²¹ The Commission has specifically noted that in any spectrum analysis of Alaska it takes into account the specific market conditions in Alaska, “which is geographically isolated from the contiguous lower 48 states, faces unique challenges for a variety of reasons associated with the immense geographic size of the state, its comparatively low statewide population of about 710,000, the lowest population density in the nation (particularly outside its major population centers), its difficult operating conditions, and its market structure.” *See AWN Order* at ¶ 56. The Commission has also previously allowed the spectrum screen to be exceeded in Alaska due to extremely low population density of various communities, the sparseness of coverage in certain areas, and the availability of spectrum to other providers. *See AWN Order* at ¶ 60. Any concern that otherwise may be triggered by the application of the spectrum screen is mitigated by the presence of significant rivals, the absence of spectrum constraints, and the clear public interest benefits of the leasing and subleasing arrangement.

²² *See Merger Approval Order* at ¶ 99.

²³ *In the Matter of T-Mobile License LLC, Cellco Partnership, Applications for 3.7-3.98 GHz Band Licenses, Auction No. 107*, Memorandum Opinion and Order, ULS Files Nos. 0009446137 and 0009446983 (rel. Jul. 23, 2021) (“*Auction 107 Order*”).

numerous markets including a fifth licensee as well.²⁴ Moreover, the Bureaus found that the use of spectrum to deploy 5G and other advanced wireless services rapidly “will benefit American consumers by introducing new competition in the provision of mid-band 5G services, meeting the increased demand for wireless data and by expanding, and improving advance wireless service to rural areas.”²⁵ The Bureaus found that competitive harm was unlikely due to the aggregation of spectrum by Verizon and T-Mobile.

All of the circumstances referenced by the Bureaus are present here. As detailed in Exhibit 3, there are actually four carriers with access to substantial total and low-band spectrum holdings in each of the Markets at issue: (1) AT&T; (2) Verizon; (3) DISH and (4) GCI. The Commission also noted that, in allowing spectrum aggregation above the overall spectrum screen, that “there are several smaller service providers that hold low-band spectrum across all or part of each of these CMAs, and there is additional low-band spectrum available in many of these markets,” both of which are true of the Markets in Alaska.²⁶

The Commission has also vastly increased the amount of spectrum available for mobile broadband use over the past few years. For instance, the Commission has allocated 4950 MHz of mmW spectrum across five bands subject to rules that facilitate terrestrial wireless use.²⁷ Moreover, the Commission recently completed the 3.5 GHz Band auction, in which numerous entities purchased spectrum in Alaska.²⁸ There may also be additional mid-band spectrum coming online in Alaska within the next few years, as both the C-Band and the 3.45-3.55 GHz bands may allow for significant deployment of mobile wireless services in Alaska in the future. Indeed, the Commission recently concluded that “given current spectrum holdings of rival service providers, including mmW spectrum, as well as spectrum coming online in the near future, we find it unlikely that rival serviced providers or potential entrants would be foreclosed from expanding capacity, deploying mobile broadband technologies, or entering the market, notwithstanding New T-Mobile’s significant post-transaction spectrum holdings,”²⁹ – which are well above the holdings that Lessee will have access to once the leasing and subleasing arrangements are effective. This is particularly true in Alaska, as demonstrated by the recently concluded 3.5 GHz Band auction – where licenses went unsold in 19 of the 29 available geographic areas.

²⁴ *Id.* at ¶ 30.

²⁵ *Id.* at ¶ 34.

²⁶ *Id.*

²⁷ *Id.* at ¶ 99.

²⁸ *See Auction of Priority Licenses in the 3550-3650 MHz Band Closes*, AU Docket No. 19-244, Public Notice, DA 20-1009, (rel. Sept. 2, 2020).

²⁹ *T-Mobile/Sprint Order* at ¶ 99.

Several other diverse competitors have constructed facilities or hold spectrum in the Markets, including nationwide providers AT&T,³⁰ Verizon, DISH and T-Mobile, as well as numerous providers unique to Alaska.³¹ These providers have significant amounts of spectrum, and these carriers will ensure that a high degree of competition will continue to exist.

In addition, DISH has committed to deploying facilities-based 5G broadband service capable of serving 70 percent of the U.S. population by June 2023.³² And, DISH will soon have the ability, pursuant to the divestiture order, to purchase T-Mobile's nationwide 800 MHz spectrum – further increasing DISH's total and under-1-GHz spectrum holdings.

Lastly, Lessee's attributable spectrum holdings are also overinflated. 14 MHz of T-Mobile's 800 MHz spectrum currently is attributed to Lessee. This spectrum is subject to a lease that has been terminated by T-Mobile, with such termination being effective June 2023, at which point, GCI's spectrum holdings in Alaska will decrease by 14 MHz statewide. At that time or before, the 800 MHz spectrum nationwide (including in Alaska) will be able to be purchased by DISH, which further solidifies DISH's under-1-GHz offerings.

VI. Conclusion

For the foregoing reasons, the leasing and subleasing arrangements will serve the public interest, convenience, and necessity.

³⁰ AT&T's spectrum holdings are actually under undercounted by the FCC's spectrum screen. Currently, AT&T has the ability to use up to 20 MHz of 700 MHz spectrum used in collaboration with FirstNet when such spectrum is not being used by FirstNet customers.³⁰ This spectrum currently is not included in the under-1-GHz spectrum threshold. *AT&T Deploys 700 MHz Band 14 Spectrum in 500 Markets*, MISSION CRITICAL COMMUNICATIONS (Jan. 19, 2019), <https://www.rmmidiagroup.com/News/NewsDetails/NewsID/17815> (When not in use by FirstNet subscribers, AT&T customers can enjoy band 14's added coverage and capacity).

³¹ The Commission has noted that numerous non-nationwide providers have at least 25 MHz of cellular spectrum in parts of Alaska, including Copper Valley Wireless, Cordova Wireless, TelAlaska, and OTZ Telephone. *See AWN/T-Mobile Order*, at n. 65.

³² *Merger Approval Order*, ¶ 369 (citing Letter from Jeffrey H. Blum, Senior Vice President, Public Policy and Government Affairs, DISH, to Donald Stockdale, Chief, Wireless Telecommunications Bureau (July 26, 2019) at 3-4).

Schedule A

FCC Licenses and Leased and Subleased Spectrum

Spectrum to be Leased

FCC Call Sign	Licensee	Leased Area	Band/Market	Frequencies Leased (MHz)	Exp. Date
B014	Fixed Wireless Holdings, LLC	Outside the Anchorage GSA, with the exception of geographic area covered by the following boroughs (which will be leased to AWN once the current lease with Optimera has concluded): Aleutians East, Aleutians West, Bristol Bay, Dillingham, Kodiak Island and Lake and Peninsula.	BRS – BTA014 – Anchorage, AK	(1) 2602-2614; and (2) 2640.5-2673.5	3/28/2026
B014	Fixed Wireless Holdings, LLC	Outside the Anchorage GSA for the following boroughs: Aleutians East, Aleutians West, Bristol Bay, Dillingham, Kodiak Island and Lake and Peninsula	BRS – BTA014 – Anchorage, AK	2640.5-2662.5	3/28/2026
B014	Fixed Wireless Holdings, LLC	Inside the Anchorage GSA	BRS - BTA014 – Anchorage, AK	(1) 2500-2502; (2) 2657-2673.5	3/28/2026
WQYL293	Sprint Spectrum License Holder LLC	The entire geographic area of the license	BRS – BTA014 – Anchorage, AK	2618-2640.5	3/28/2026
WMX713	American Telecasting of Anchorage, LLC	The entire geographic area of the license	EBS – P01276 – P35 GSA	(1) 2596-2602; (2) 2673.5-2690	5/1/2031
B136	Clearwire Spectrum Holdings II LLC	The entire geographic area of the license	BRS – B136 – Fairbanks, AK	(1) 2602-2614; (2) 2618-2651.5	3/28/2026
WQYK923	Sprint Spectrum License Holder LLC	The entire geographic area of the license	BRS – B136 – Fairbanks, AK	2651.5-2673.5	3/28/2026
B221	WBSY Licensing, LLC	The entire geographic area of the license	BRS – B221 – Juneau, AK	(1) 2602-2614; (2) 2618-2651.5	3/28/2026

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WQYK982	Sprint Spectrum License Holder LLC	The entire geographic area of the license	BRS – B221 – Juneau, AK	2651.5-2673.5	3/28/2026
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Spectrum to be Subleased

Call Sign	Licensee	Frequencies	Market	Expiration Date
WNC732	Shekinah Network	2502-2518.5 MHz	Anchorage BTA	05/02/2026
WLX586	Views on Learning, Inc.	2518.5-2535 MHz	Anchorage BTA	07/13/2022
WNC386	Clarendon Foundation, Inc.	2590-2596 MHz	Anchorage BTA	08/12/2024
WNC773	Shekinah Network	2515-2518.5 MHz	Fairbanks, BTA	07/05/2026
WLX453	Views on Learning, Inc.	2518.5-2535 MHz	Fairbanks, BTA	03/13/2022
WNC772	Clarendon Foundation, Inc.	2593.5-2596 MHz	Fairbanks, BTA	06/05/2026
WNC729	Clarendon Foundation, Inc.	2596-2602 MHz	Fairbanks, BTA	06/05/2026