

NCN Response to Question 7 of Form 442

The licensed spectrum will be used to continue ongoing testing and implementation of new technologies and equipment in densely populated urban environments. On a daily basis, Times Square has the greatest user density of any location in the country. On New Year's Eve, it has the greatest mobile user density ever recorded, with over 2 million revelers. Due to the sleek architecture of surrounding buildings and the ever present billboards, there is a paucity of reasonably priced real estate that carriers can access to address the lack of capacity at this venue. NCN has permanent installations in the Square that are provided by its partner - the Times Square Alliance, a nonprofit, quasi-governmental Business Improvement District - in order to assist service providers and reduce the aesthetic blight of traditional cellular infrastructure. Deploying CBRS equipment allows NCN to offload connectivity for the major wireless carriers and for new entrants such as our client Charter, which is exploring how to handle overflow MVNO traffic via other means. With approval of this application, NCN will continue to offer offload on a neutral and non-discriminatory basis, thereby lowering the cost per GB for all carriers and reducing the pressure on all the carriers to find new locations in the area.