PAL Leasing Framework Overview

WINNF Webinar: ‘We got PAL, Now What? The Future of CBRS.’

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Committee: WG5: PALS & PPA Use Task Group
Title: PAL Leasing Framework Overview:

Other Documents:

- WINNF-RC-5004-V1.0.0 FCC ULS PAL Sales and Leasing Agreements Data Recommendations
  - FCC declined to consider making changes to ULS Leasing Database & Records
- WINNF-TS-5007-V0.0.0-r5.0 (IR1) PAL Sales and Leasing Framework (formerly WINNF-I-00142)
  - assumed changes to FCC ULS Leasing Records Database
  - now requires rework
  - SASs now proving in ULS Leasing Records Database and APIs
New WINNF Concepts and Proposals

**Back Reporting:** Managing SAS reports vetted PPAs back to claimant for *Market Making Purposes*. Claimant may share these with Market Makers so preexisting claimed PPAs are known.

**Pre-cursor areas:** sub areas owned or leased that are to be disaggregated and leased or sold in a transaction. For vetting, the Transferred area(s) + Retained area(s) should sum to the Pre-Cursor area. There should be no gaps nor overlaps.

**Transferred Sub-areas:** sub areas transferred by leasing (or sales) agreements are filed as new ULS files that define this disaggregated area(s).

**Retained Sub-areas:** Additionally, after such area disaggregation, Retained sub-areas are also filed as new ULS files. This avoids the ‘recursion’ problem in determining Retained Areas retained by seller or lessor.

**Light Touch Leasing Paradigm:** Automated filing methods for Leases into ULS database for pre-authorized lessees.

**Light Touch Paradigm applied to Sales:** Automated methodology also applied to Secondary Market Sales.
Database Framework with FCC ULS

Market Maker Hosted Databases
(Users are: Lessors, Lessees, Sellers, Buyers, Brokers, Market Makers)

- Users
- Market Maker Tools (Web hosted, transactions)
- Databases facilitating leasing transactions
- Market Maker Leasing Transactions

Recorded PAL Sales & Lease Transactions
- Managing SAS Sold & Leased PAL Rights Recording

SAS Hosted Databases
- Managing SAS Vetted PPAs
  - PPAs (PPA_IDs)
    - CESD Cluster List
    - PPA Boundary
    - Claim protection

WINNF Hosted Databases
- PAL Database 96.66 (a)(2), (a)(4)
- PAL Holders (PAL_IDs) (Landlords) from Auction 105

FCC - ULS Hosted Databases
- County Boundary Contours Database
- FCC Approved Entities 96.66 (a)(1)
- Eligible Entities
  - Lessors
  - Lessees
  - Sellers
  - Buyers
  - Brokers

PAL Sales & Leasing Database
- 96.66 (a)(2), (a)(3), (a)(4), (a)(5), (b)

PAL Sales & Lease Agreements from secondary market (FN_IDs)

Required to Perform Part 96 SAS Responsibilities

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Database Framework with FCC ULS and WINNF Information database
WINNF Proposed Information set:

Recorded Information for PAL Leases (or Sales) Transactions:

- **File Number FN_ID**: unique record identifier created for every transaction
- > **Record Creator ID**: identify the market maker, broker or managing SAS
- > **Sales vs Lease indicator**: to handle both leases and sales under same Light Touch paradigm
- **Seller ID and Buyer ID, or Lessor ID and Lessee ID**: identify participants by FCC FRN
- **Original PAL ID**: original provenance, PAL slot
- > **Original FN ID (precursor area) [polygon area]**: to properly vet the area transaction, provenance
- (new) (1) **Transferred FN ID, [polygon area(s) being transferred]**: the new FN ID
- > (new) (2) **Retained FN ID [polygon area(s) being retained]**: another new FN ID
- **Transaction Start Time & Date**
- **End Date (for Leases)**
- **Record Time Stamp**
WINNF desired information not included in FCC ULS Files & Database

Information not in 608 Form or FCC ULS:

**Record Creator ID:** - identifies the market maker, broker or managing SAS

**Sales vs Lease indicator:** - to handle both leases and sales under same Light Touch paradigm

**Original FN ID (precursor area):** - [polygon area]: to properly vet the area transaction, provenance

**Retained FN ID:** - [polygon area(s) being retained]: another new FN ID
Concept of Filing Retained Areas

County PAL_ID: 34027_D

Landlord sells or Leases PPRA R7899729
Managing SAS Records corresponding transaction into:
  • FCC ULS FN_ID: 2345678910 PAL Sales & Leasing Records Database
  • Landlord may continue to make new PPA claims and PPRA offers

Buyer or Lessee:
- receives transferred sub-area

Landlord retains: New FN_ID assigned

PPA FN_ID: 56438765543
PPRA FN_ID: 7899729
PPA FN_ID: 7899611

Pre-Cursor FN_ID: 76543218909
Transferred area(s)

Transferred FN_ID: 76543218909

Retained FN_ID: 76543218910
Retained area(s)

Managing SAS need not subtract FN_ID Transferred area(s)
Without Retained Areas and Requiring ‘Recursion’ Assessment

- Landlord sells or leases
- Managing SAS
- FCC ULS FN_ID: 2345678910 PAL Sales & Leasing Records Database
- Landlord may continue to make new PPA claims and PPRA offers

Managing SAS Functions
- Managing SAS must ‘subtract’ ALL subsequent FN_ID transactions for that PAL to determine retained area of PAL for landlords
- For future landlord PPA claims
- For future landlord PPRA offers

County PAL_ID: 34027_D
- Landlord retains original PAL_ID: 34027_D
- PPRA (future sale or lease)
- PPA
- P7899545
- R7899729
- PPA
- P7899611

Transferred area(s)
- FN_ID: 2345678910