

October 11, 2019

Ex Parte

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

Re: *Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band*, GN Docket No. 18-122;
Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's
Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed
Wireless Broadband Service in the 3.7-4.2 GHz Band, RM-11791

Dear Ms. Dortch:

On October 9, 2019, Andy Clegg and Michael Purdy of Google LLC; Joely Denkinger of Harris, Wiltshire & Grannis LLP; and I met with Becky Schwartz, Max Staloff, Thomas Derenge, Blaise Scinto (by phone), Jeffrey Tignor (by phone), Kamran Etemad (by phone), Paul Powell (by phone), and Peter Daronco (by phone) from the Wireless Telecommunications Bureau and Patrick DeGraba from the Office of Economics and Analytics. On October 11, 2019, Andy Clegg and Megan Stull of Google LLC, Joely Denkinger, and I met separately with Commissioner Brendan Carr and with Aaron Goldberger, Wireless & International Advisor to Chairman Ajit Pai.

During the meetings, we reiterated Google's position that the Commission should allow sharing by fixed point-to-multipoint ("P2MP") systems in the part of the C-band retained for fixed satellite services ("FSS") by modifying the Part 101 rules to allow opportunistic shared use with protection for FSS systems. We explained that straightforward changes to the existing rules can enable this sharing, and that equipment already exists that could support C-band P2MP operations. Additionally, we noted that P2MP sharing will not impact the repacking process or future flexible use licenses in the band, nor will it adversely impact incumbent FSS systems in the band. The technical study by Professor Reed recently submitted by Google, Microsoft, and WISPA shows that sharing with FSS is technically feasible and could expand broadband services to over 80 million Americans, even under conservative co-channel operating assumptions. Eliminating unnecessary full-band, full-arc coordination, we explained, would use C-band spectrum more efficiently and could bring broadband to even greater numbers of rural and unserved Americans.

We briefly discussed related technical issues, clarifying that P2MP services will not interfere with the use of the adjacent 4200-4400 MHz band for radio altimeters, as fixed services have long existed adjacent to these operations and P2MP operations can be engineered to avoid areas with radio altimeters as needed. We also described how P2MP operations will not disrupt portable C-band satellite terminals. Additionally, in response to a question in the meeting with

Ms. Marlene H. Dortch
October 11, 2019
Page 2 of 2

Wireless Bureau staff, we explained that Google supports out-of-band-emissions limits similar to the 3.5 GHz band limits for new flexible use licenses in the repurposed part of the C-band.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Margie", enclosed within a thin black rectangular border.

Paul Margie
Counsel to Google LLC

cc: Meeting Participants