

October 13, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Notice of Ex Parte Presentation in GN Docket Nos. 17-183, 14-177, 15-256

Dear Sir or Madam:

Pursuant to Section 1.1206 of the Commission's rules, this letter provides notice that Cambridge Broadband Networks, Ltd. (CBNL) held meetings on October 10, 2017 at 2:30 PM ET on the 3rd Floor with Blaise Scinto (Chief), John Schauble (Deputy Chief), Simon Banyai, Nancy Zaczek and Peter Duranco of the Broadband Division, WTB. Also attending by conference phone was Stephen Buenzow and Melissa Conway.

Attending on behalf of Cambridge Broadband Networks were Dr John Naylon, CTO and Co-Founder; Chris Wright, Director of Marketing/PR and James Childs, Senior Director of Strategy for North America.

The meeting followed the agenda indicated below:

- Introduction
- Technical items
 - A presentation of the practical considerations when operating both TDD and FDD systems within one band
 - A presentation of the characteristics of mid-band FWA that could apply to liberalized two way MVDDS (12GHz) spectrum
- Procedural items
 - Auction proceedings for 24GHz, 28GHz, 37GHz, 39GHz, 42GHz bands
 - Participation on advisory committees and other knowledge-sharing exercises

The presentation material used during the meeting is included herewith.

In discussing the matter of TDD and FDD systems sharing a single band, John Schauble for the Commission confirmed the intent is to allow fair access for both TDD and FDD users. Regarding the need for two blocks of spectrum in order to operate an FDD system, thus doubling the amount of spectrum (relative to a TDD operator) that must be acquired at auction, it is envisaged that, post-auction, a spectrum holder could exercise their rights to disaggregate the spectrum and re-sell some part of it. In this way, secondary market action could equalize the apparent unfairness towards FDD operators.

CBNL nevertheless point out that this pre-supposes the existence of a functional secondary market including a willing buyer of the disaggregated spectrum. The lack of certainty that such a buyer will exist, we believe, means that the current plans still do not treat FDD and TDD operations equally. We therefore reiterate our request that this be addressed, perhaps by suitable design of the auction rules.

Pursuant to the previous point, two additional ideas were discussed that may be possible to apply as part of auction rules. The first is in making a non-binding recommendation on transmit-receive spacing for FDD bidders. This acts to avoid wasteful fragmentation of the FDD sub-band, in the case that the allocation scheme outlined in slides 16–17 is followed. Secondly, the concept that a consortium of bidders may bid for spectrum blocks was discussed. By pre-agreeing to disaggregate and apportion the spectrum in some way amongst themselves, such a consortium could facilitate bidders wishing to access smaller quanta of paired spectrum.

CBNL wishes to thank the Commission for the open and constructive discussion.

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

/s/ James W. Childs

James W. Childs
CBNL

/s/ John Naylon

Dr John Naylon
CBNL

cc: Chairman Ajit Pai
Commissioner Michael O’Rielly