

February 15, 2018

Ex Parte

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

Re: ET Docket No. 16-56, ET Docket No. 14-165, MB Docket No. 15-146, RM-11745, GN
Docket No. 12-268

Dear Ms. Dortch:

On February 13, a group of rural broadband providers serving customers in California, Colorado, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Dakota, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming¹ met with Chairman Pai and his Legal Advisor Alison Nemeth; Commissioner Clyburn, her Senior Legal Advisor Louis Peraertz, and Law Clerk Joseph Kerins; Erin McGrath, Legal Advisor to Commissioner O'Reilly; Umair Javed, Legal Advisor to Commissioner Rosenworcel; and Julius Knapp, Karen Rackley, Paul Murray, Matthew Hussey, Hugh Van Tuyl, and Martin Doczkat, all of the Office of Engineering and Technology.

In these meetings, the companies discussed the importance of White Spaces technologies in expanding broadband access in rural America, and asked the Commission to assist in these efforts by resolving long-pending petitions for reconsideration and ensuring that enough spectrum remains available across the country to support their work. They explained that White Spaces technologies are uniquely valuable for bringing broadband connectivity to rural areas because they operate on the only low-frequency unlicensed band available. White Spaces technologies therefore make it possible to cover rural areas that would be technically impossible or economically infeasible for providers to reach using any other technology. They discussed their existing White Spaces deployments, projects, and experimental licenses which enable them to provide rural customers with high-speed broadband even over very large distances.

The group also discussed steps that the Commission can take to facilitate greater rural broadband deployments. First, the Commission can improve regulatory certainty by resolving pending petitions for reconsideration of the White Spaces rules. In doing so, they requested that the Commission:

¹ A full list of meeting participants is attached to this letter.

1. Allow greater antenna heights, height over average terrain, and higher transmit power for fixed White Spaces deployments to allow improved rural coverage;
2. Facilitate White Spaces channel bonding;
3. Replace the existing “push” notification rule, which almost all parties agree is unworkable, with an alternative approach that protects microphones used for electronic newsgathering by establishing two fast-polling channels in every market;
4. Affirm the Commission’s decision on the size of channel 37 exclusion zones for wireless medical telemetry sites; and
5. Move forward with permitting White Spaces operations in channel 37 as soon as possible.

The group also requested that the Commission ensure that sufficient White Spaces spectrum remains available nationwide by acting to ensure that three channels will remain available in every market, including in urban areas. Availability in urban areas will accelerate rural broadband by reducing equipment costs through improved economies of scale—driving down cost will allow providers in the nation’s toughest areas to serve more Americans. The group also requested that the Commission work to prioritize efficient channel placement of low-power and translator stations so that channel selections do not unnecessarily block the three channels that broadband providers need to facilitate higher-power operations in rural areas.

Pursuant to the Commission’s rules, I have filed a copy of this notice electronically in the above-referenced docket. If you require any additional information, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Margie".

Paul Margie
Counsel for Microsoft Corporation

cc: meeting participants

Meeting Participants

Bob Nichols, CEO, Declaration Networks

Cory Heigl, Vice President, CCI Systems, Inc. d.b.a. Packerland Broadband

Robin Kennedy, CEO, Spokane Tribe Telecom Exchange

David Deming, CEO, WildFire 5G

Emiel Butcher, President, Micrologic

Michael Sherrell, Vice President, Micrologic

Fred Englemann, Network Engineer, Adirondack Internet/Public Access

Greg Jarmon, CTO, Watch Communications

Joe Lenig, Head of Impact, Virginia Broadband, LLC VABB

James DaBramo, COO, LICT Corporation

Jeff Kohler, Co-Founder, Rise Broadband

Jim Gilbert, Director of Business Development, Allband Communications

Kyle Quillen, CEO, Agile Networks

Susan Corbett, CEO, Axiom Technologies LLC

Mark Ouellette, President, Axiom Technologies LLC

Steven Hubbard, CEO, RTO Wireless

Rob Reagan, CTSO, RTO Wireless

Erin Wichmann, Director of Network Engineering & Switching Operations, Bug Tussel

Brett Glass, Owner and Founder, Laramie Internet Access and Telecommunications

Tony Veach, Attorney, Pioneer Communications

William Seiz, President, Final Mile Communications

Paul Garnett, Senior Director, Microsoft Airband Initiative, Microsoft

Sid Roberts, Principal Technical Program Manager, Microsoft Airband Initiative, Microsoft

Vickie Robinson, Director, Microsoft Airband Initiative, Microsoft

Mike McMahon, Senior Director, U.S. Government Affairs, Microsoft

Melissa Sassi, Program Manager, Microsoft Airband Initiative, Microsoft

Paul Margie, Harris, Wiltshire & Grannis, LLP