



Robert M. McDowell
+1 202 842 7862
rmcdowell@cooley.com

February 16, 2018

Ex Parte filed via ECFS

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, MB Docket No. 16-306, RM-11745, GN Docket No. 12-268

Dear Ms. Dortch:

On February 14, 2018, Paula Boyd and Paul Garnett of Microsoft Corporation; Haiyun Tang, CEO and Founder and Keith Sinclair, VP of Marketing of Adaptrum, Inc.; and I met with Nicholas Degani (Senior Counsel to Chairman Pai) and Alison Nemeth (Legal Advisor to Chairman Pai). We also met separately with Julius Knapp, Chief Engineer, Office of Engineering & Technology and Matthew Hussey, Associate Chief (Policy), Office of Engineering and Technology. During the meetings, Microsoft and Adaptrum discussed the deployment of Microsoft's Rural Airband Initiative, which has the potential to bring wireless broadband to currently unserved or underserved rural areas across the country. To allow for such expansive deployment, we requested that the Commission resolve a set of issues discussed in a Petitions for Reconsideration¹ and adopt policies that maximize spectral efficiency to improve broadband access in rural communities, including increasing power and antenna heights in rural areas. Specifically, we discussed the need to resolve the Channel 37 and Database Accuracy proceedings as soon as possible to provide regulatory certainty for all involved. In addition, we discussed the economics of Adaptrum's chip design and manufacturing process and the need for regulatory certainty regarding the available spectrum for rural broadband to foster continued investment and increased participation in the Rural Airband Initiative.

¹ See *Response and Opposition to Petitions for Reconsideration of Microsoft Corporation*, ET Docket No. 14-165, GN Docket No. 12-268 (Feb. 29, 2016); *Reply in Support of Petition for Reconsideration of Microsoft Corporation*, ET Docket No. 14-165, GN Docket No. 12-268 (Mar. 10, 2016).



Marlene Dortch
February 16, 2018
Page Two

Pursuant to Section 1.1204 of the FCC's rules, I have filed a copy of this notice electronically in the above-referenced dockets. If you require any additional information, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, reading "Robert M. McDowell".

Robert M. McDowell
Counsel to Microsoft Corporation

cc: Meeting participants