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Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49;
Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258;
Petitions for Rulemaking Regarding the Citizens Broadband Radio Service, RM-11788, RM-11789;
Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354;
Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz, GN Docket No. 17-183;
Use of Spectrum Bands Above 24 GHz for Mobile Radio Service, GN Docket No. 14-177**

Dear Ms. Dortch:

On October 26, 2017, Rick Chessen and I of NCTA – The Internet & Television Association met with Erin McGrath, Legal Advisor for Wireless, Public Safety and International to Commissioner Michael O'Rielly, regarding the above-referenced proceedings.

During the meetings we first provided an update on the cable industry's significant investment in the Wi-Fi and wireless space, noting that many cable customers experience the Internet through Wi-Fi, in their homes, businesses, or in public spaces. We highlighted that Wi-Fi carries a vast and growing amount of the traffic that travels over the Internet, and that to keep pace with demand, the Commission will need to designate a significant amount of new unlicensed spectrum in the next few years. We also noted that NCTA's members are engaging in trials in new or proposed licensed bands and beginning to offer mobile service pursuant to MVNO arrangements.

We also discussed a variety of proceedings in which the Commission has teed up policy decisions that could support continued technological advancements and future wireless broadband investment.

With regard to the 5.9 GHz band, we noted our continued belief that no other spectrum band is better suited to address the unlicensed spectrum crunch. This band is located adjacent to the existing U-NII-3 band, would enable the use of additional 160 MHz channels needed to support Gigabit Wi-Fi, and has next to no deployed commercial DSRC operations. We also described the advent of newer automotive safety technologies, and the Department of Transportation's decision to revise the status of the proposed DSRC mandate. We urged the Commission to move forward soon to enable more efficient use of the 5.9 GHz band by unlicensed technologies.

NCTA also highlighted the cable industry's interest and investment in 3.5 GHz standards development and testing. We noted cable's support for reasonable changes to the PAL geographic area and license term that will facilitate investment by a wide variety of providers in the band.

We also summarized NCTA's recent filing in the Commission's mid-band spectrum docket,¹ noting that NCTA's members continue to rely on satellite C-band spectrum as a primary means of distributing television content. As the Commission explores flexible wireless use of C-band spectrum, it should ensure that new operations will fully protect incumbents, including C-band satellite operations. Provided that incumbents can be fully protected, we support designating the 5.925-7.125 GHz band for unlicensed broadband use.

With respect to the Spectrum Frontiers docket, we expressed our continued support for the Commission's decision to designate the 64-71 GHz band for unlicensed use.

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

Respectfully submitted,

/s/ Danielle J. Piñeres

Danielle J. Piñeres

cc: Erin McGrath

¹ See generally Comments of NCTA – The Internet & Television Association, GN Docket No. 17-183 (filed Oct. 2, 2017).