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March 27, 2018

**Ex Parte**

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

**Re: *Promoting Investment in the 3550-3700 MHz Band, GN Docket No. 17-258;  
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***

Dear Ms. Dortch:

On March 23, 2018, Colleen King of Charter Communications, Inc. (“Charter”), David Don of Comcast Corporation, and Jacqueline Clary and myself of NCTA – The Internet and Television Association (“NCTA”) met with Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety to Commissioner Jessica Rosenworcel. On March 26, 2018, Elizabeth Andrion of Charter and Jacqueline Clary and myself of NCTA met with Margaret Wiener, Peter Trachtenberg, Matthew Pearl, Paul Powell, Martha Stancill, Christiaan Segura, Jessica Greffenius, and Joyce Jones of the Wireless Telecommunications Bureau and Julius Knapp and Navid Golshahi of the Office of Engineering and Technology, and separately with Erin McGrath, Legal Advisor, Wireless, Public Safety and International to Commissioner Michael O’Rielly. On March 27, 2018, Elizabeth Andrion of Charter and Jacqueline Clary and myself of NCTA met with Will Adams, Legal Advisor to Commissioner Brendan Carr.

Regarding 3.5 GHz, NCTA noted that the cable industry is actively investing in the research, standards development, and testing necessary to deploy services in the band. We noted the cable industry’s continued support for county-sized licenses as a middle ground approach between PEAs and census tracts, for the reasons described in NCTA’s comments in the 3.5 GHz proceeding.<sup>1</sup> We noted that NCTA’s members are active participants in stakeholder discussions regarding other compromise approaches on license size and expressed concern about approaches that could result in significant delay.

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<sup>1</sup> Comments of NCTA – The Internet & Television Association, GN Docket No. 17-258, at 3-9 (filed Dec. 28, 2017).

We also discussed the concern shared by many of NCTA's programmer and operator members that the emission limit changes proposed by Qualcomm to facilitate channel bonding will increase the noise in adjacent C-band spectrum. As discussed in NCTA's reply comments, the record suggests that Qualcomm's proposal will increase the noise in the 3710-3720 MHz portion of upper adjacent C-band spectrum by 12 dB, and that even the more graduated mask on which the Commission sought comment would cause a 5 dB noise increase.<sup>2</sup> We urged the Commission to require much more rigorous technical analysis demonstrating that the proposed emission limits would not cause harmful interference to adjacent C-band incumbents before adopting any changes to the emission limits. NCTA also described members' concern that the in-band noise floor increase resulting from the proposed emissions changes could disproportionately disadvantage lower-power CBRS users.

In the meetings with Erin McGrath and Travis Litman, we also we noted our continued belief that no other spectrum band is better suited to enable Gigabit Wi-Fi than the 5.9 GHz band. We described changes in the automotive technology market and in the adjacent spectrum environment that suggest that the Commission should renew its efforts in the band. We urged the Commission to move forward soon to enable more efficient use of the 5.9 GHz band by unlicensed technologies.

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

**/s/ Danielle Piñeres**

Danielle Piñeres

cc: meeting participants

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<sup>2</sup> Reply Comments of NCTA – The Internet & Television Association, GN Docket No. 17-258, at 10 (filed Jan. 29, 2018).