



The Internet & Television Association  
25 Massachusetts Avenue, NW | Suite 100  
Washington, DC 20001  
(202) 222-2300

**Danielle Piñeres**  
Vice President & Associate General Counsel

o (202) 222-2459 e dpineres@ncta.com

April 16, 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***

Dear Ms. Dortch:

On April 12, 2018, Colleen King of Charter Communications, Inc., David Don of Comcast Corporation, Barry Ohlson of Cox Enterprises, and Jacqueline Clary and myself of NCTA – The Internet and Television Association (“NCTA”) met with Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai, regarding the above-referenced proceeding.

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.

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

---

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

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

Ms. Marlene H. Dortch  
April 16, 2018  
Page 2

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.

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

**/s/ Danielle Piñeres**

Danielle Piñeres

cc: Rachael Bender