



April 27, 2017

Ex Parte

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

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; 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; Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, ET Docket No. 14-165; Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band for Use by White Space Devices and Wireless Microphones, MB Docket No. 15-146; Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95, RM-11664, and WT Docket No. 10-112; Joint Petition for Rulemaking of America's Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters Seeking to Authorize Permissive Use of the "Next Generation TV" Broadcast Television Standard, GN Docket No. 16-142

Dear Ms. Dortch:

On April 25, 2017, Michael Daum, Director, Technology Policy, and Paula Boyd, Senior Director, Government and Regulatory Affairs both of Microsoft Corporation, spoke with Erin McGrath, Legal Advisor, Wireless, Public Safety and International for Commissioner Michael O'Rielly. On April 26, Michael Daum, Ranveer Chandra, Principal Researcher, Microsoft Research and Paula Boyd separately spoke with Daudeline Meme, Legal Advisor, Wireless, International and Public Safety for Commissioner Mignon Clyburn and Rachael Bender, Acting Wireless Advisor for Chairman Ajit Pai. In these meetings, we discussed Microsoft's unlicensed spectrum priorities, including the TV white spaces, millimeter wave spectrum, the 6 GHz band, and the 5 GHz band.

Consistent with Microsoft's filings on the issue, Mr. Daum expressed support for ensuring that three 6 MHz channels are available for unlicensed use in the 600 MHz and TV bands, and highlighted the existing and potential unlicensed uses of the band. Mr. Daum discussed the importance of preserving the use of the duplex gap, channel 37 and a vacant channel in each television market for unlicensed use. He also referenced the FCC's NPRM regarding the ATSC 3.0 simulcasting proposal and noted that it will, at a minimum, create additional uncertainty for TV white spaces investments and such a transition should be done in a manner that does not delay or adversely affect unlicensed use of the TV bands. Even so, Microsoft made it clear that in no way should the ATSC 3.0 proceeding be used as a vehicle to unnecessarily extend the incentive auction transition period.

Ms. Marlene H. Dortch

April 27, 2017

Page 2 of 2

Mr. Daum explained why the Commission should reject the Petitions for Reconsideration in the Spectrum Frontiers Report and Order that seek to roll back, in whole or in part, the Commission's decision to extend the unlicensed 60 GHz band (57-64 GHz) up to 71 GHz. He expressed Microsoft's support for exploring unlicensed use of the 6 GHz band and described its interests and the ongoing work to better understand how unlicensed devices can operate in the 6 GHz band without causing harmful interference to incumbent operations. In addition, in our discussions with Ms. McGrath and Ms. Bender, Mr. Daum noted Microsoft's support for unlicensed use of the 5.9 GHz band and the Qualcomm sharing proposal.

Lastly, Microsoft described its interests and level of engagement in various ITU-R and ITU-D activities and expressed appreciation for Chairman Pai's engagement on the issue as well as the Chairman and Commissioner O'Rielly's comments at the recent WRC-19 Advisory Committee public meeting. Microsoft indicated it looks forward to their active participation in the lead up to WRC-19.

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

Sincerely,

/s/ Paula Boyd

Paula Boyd
Sr. Director, Government and Regulatory Affairs
Microsoft Corporation

cc: Erin McGrath
Daudeline Meme
Rachael Bender