



April 29, 2019

Ex Parte

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

Re: *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;

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268.

Dear Ms. Dortch:

On April 25, 2019, Paul Garnett and I met with Matthew Duchesne, Barbara Esbin, Sayuri Rajapakse, Janet Sievert, and Susan Mort of the FCC's Office of Native Affairs and Policy. We discussed the unique potential of White Space technologies to connect rural native communities throughout the United States by dramatically improving the economics of rural deployment.

We highlighted Microsoft's Airband initiative, through which Microsoft has invested in digital skills training and partnered with several local broadband providers to serve tribal communities using White Space technologies.¹ We explained the importance of ensuring that sufficient White Spaces spectrum is available to support such deployments as well as Microsoft's proposals to make targeted but important changes to the Commission's White Spaces rules to further improve the efficiency of

¹ See Microsoft, *Microsoft: Airband: An update on connecting rural America*, <https://news.microsoft.com/rural-broadband/> (last visited Apr. 29, 2019); Microsoft, *Airband Initiative*, <https://www.microsoft.com/en-us/airband> (last visited Apr. 29, 2019); Microsoft, *FarmBeats: AI, Edge & IoT for Agriculture*, <https://www.microsoft.com/en-us/research/project/farmbeats-iot-agriculture/> (last visited Apr. 29, 2019).

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White Spaces deployments.² Finally, we discussed the importance of compiling accurate information about the availability of broadband connectivity to allow the Commission and industry to more effectively target their efforts to close the digital divide.

Respectfully submitted,

/s/ Paula Boyd

Paula Boyd
*Senior Director, Government and
Regulatory Affairs*

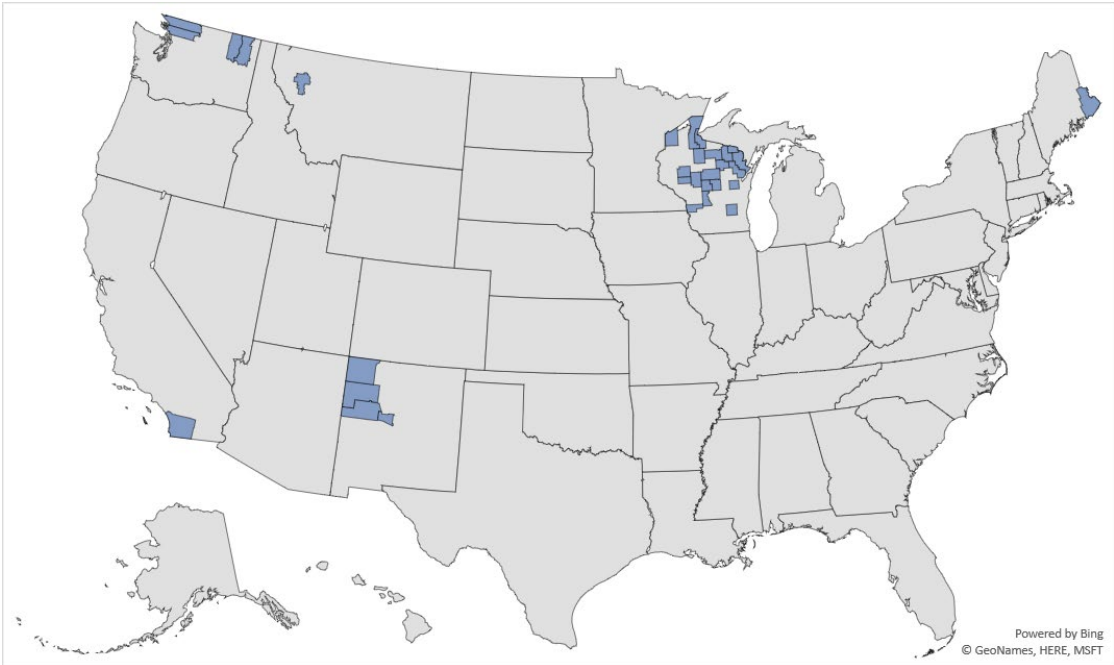
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Enclosure

cc: meeting participants

² Letter from Paula Boyd & Michael Daum, Microsoft Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, ET Docket No. 14-165, GN Docket No. 12-268 (filed Oct. 2, 2018).

Airband Broadband Projects Serving Tribal Lands



Airband Projections

Projected
Population Under
Coverage

155,806

Projected Unserved
Population Under
Coverage

120,775

Airband Partner & Project Summary

Native Network: Native Network constructs and deploys wireless internet access networks to provide affordable hybrid and fixed wireless broadband internet access to the tribes within Flathead Reservation in Montana as well as Lummi Nation and Swinomish Tribe in Washington. Native Network is dedicated to supporting Native American Tribes and their Lands by providing broadband connectivity to these communities.

Sacred Wind (partnership in development): Sacred Wind Communications (SWC) is committed to improving telecommunication systems in New Mexico, by pursuing the most appropriate technologies and affordable alternatives for customers. SWC uses a mix of technologies including copper, fiber, microwave and towers to expand connectivity in rural New Mexico. The population served by this project is majority Native American, 100% unserved per the FCC, and much of the population currently has no connectivity whatsoever. Tribal lands to be served include Navajo Nation, Zuni Pueblo, and Acoma Pueblo.

Other partners serving tribal areas: Axiom (Passamaquoddy), Declaration Networks Group (Colville Tribes), Packerland Broadband (Bad River Band, Lac du Flambeau Band, Mole Lake Chippewa, Potawatomi, among others), and Tribal Digital Village (Rincon, Pala, Pauma, San Pasqual, Mesa Grande, Manzanita, among others).