



May 25, 2018

*Via Electronic Filing*

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

**Re: *Starry, Inc. Notice of Ex-Parte Communication; Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112***

Dear Ms. Dortch:

On May 23, 2018, Starry, Inc., represented by Chet Kanojia, Chief Executive Officer and Virginia Lam Abrams, Senior Vice President of Communications & Government Relations, participated in a phone call with Rachael Bender, Wireless and International Advisor to FCC Chairman Ajit Pai.

During the phone conversation, Starry briefed Ms. Bender on Starry's deployment progress and plans for expansion. Starry also expressed support for the FCC's draft *Spectrum Frontiers Report & Order* released on May 17, 2018, specifically, the decision to deny the pending petitions for reconsideration of the Commission's decision to make the 37-37.6 GHz band available for coordinated shared access.

Starry believes the decision to deny the pending petitions for reconsideration will have a positive and meaningful impact in enabling low-barrier access to high-quality, licensed mmW spectrum. Starry believes this action will usher in a significant wave of investment and innovation in new wireless technology in these bands, including Starry's continued investment in building out a competitive, consumer-focused broadband network across the United States.

Starry also expressed its appreciation for the thoughtful licensing framework proposed by the Commission in the FNPRM. Starry respectfully suggested that in order to develop the most robust record possible, that the Commission expand the FNPRM in the following ways:

- State clear principles for the sharing mechanism to include: 1) facilitation of quick access to spectrum without unreasonable processing delays; 2) implementation of a robust and effective enforcement mechanism; 3) creation of a predictable path for future federal coordination into the band.
- Clarify how point-to-multipoint network architecture fits into the three licensing schemes described, to ensure that there are no unnecessary or unintended barriers created that would impede deployment of point-to-multipoint systems for fixed or mobile wireless access.
- Provide additional details or clarification for how interference to existing systems will be determined in the coordination process.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. We have also provided a copy of this letter electronically to all Commission personnel who were in attendance. Please contact the undersigned with any questions.

Respectfully submitted,  
Virginia Lam Abrams  
Starry, Inc.

cc:  
Rachel Bender