

June 21, 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; 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, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap; 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, GN Docket No. 12-268, ET Docket No. 14-165, MB Docket No. 15-146

Dear Ms. Dortch:

On June 19, 2017, Brad Smith, President and Chief Legal Officer, Microsoft Corporation; Paula Boyd, Senior Director of Government and Regulatory Affairs, Microsoft Corporation; and I met with Commissioner Mignon Clyburn; Daudeline Meme, Legal Advisor; and Jeremy Greenburg, Law Clerk. On the same day, we met with Commissioner Michael O'Rielly and Erin McGrath, Legal Advisor.

During these meetings, Mr. Smith observed that millions of Americans, including millions of students, largely in rural communities, lack broadband internet access, which is a critical component of enabling success in today's digital society. Microsoft's research and community deployments¹ have shown that white spaces technology is a very effective tool for expanding existing broadband networks into unserved or underserved communities. This is because white spaces technologies use a frequency band that permits network operators to extend wireless broadband signals significantly farther than other bands, while requiring less infrastructure and increasing affordability. As a result, with white spaces technologies, providers can expand their networks to serve communities where existing technologies are economically impractical to deploy.

The FCC can enable white spaces technologies across the country by ensuring that there are a minimum of three white spaces channels in each market. Mr. Smith explained that this

¹ See, e.g., Letter from Paul Garnett, Senior Director, Affordable Access Initiatives, Microsoft Corp. to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, ET Docket Nos. 13-49, 14-165, MB Docket No. 15-146 (filed May 31, 2017).

regulatory certainty is critical to supporting the investment needed to take the important step of reducing the technology to a chip. This will drive down prices to levels that can allow pervasive nationwide availability—but chipmakers will only take this step if there are three channels available. To ensure this, Microsoft asked the FCC to adopt its proposal to preserve one vacant UHF channel in each market for use by white spaces technologies, and resolve the remaining white spaces proceedings to ensure that the rules for white spaces operations in channel 37 and the duplex gap encourage investment.

Microsoft also discussed its recent study, which confirms that preserving a single vacant UHF channel for white spaces operations would have no impact on low-power television broadcasters or translators in most markets, and a *de minimis* impact in a small number of markets, as described in its *ex parte* letter dated June 15, 2017.² In addition, even the very few affected low power television broadcasters can be accommodated in the television band through channel sharing and other mechanisms the FCC will make available.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Margie".

Paul Margie
Counsel for Microsoft Corporation

cc: meeting participants

² See generally Letter from Paul Margie, counsel for Microsoft Corp. to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268, ET Docket No. 14-165, MB Docket No. 15-146 (filed Jun. 15, 2017).