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**July 17, 2017**

**Ex Parte**

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

Re: GN Docket No. 12-354

Dear Ms. Dortch:

On July 6, 2017, Kalpak Gude, President of the Dynamic Spectrum Alliance (DSA) met with Erin McGrath, Wireless Legal Advisor to Commissioner Michael O’Rielly, regarding the above-listed proceeding. Mr. Gude was on travel and unable to file in a timely manner but is doing so now.

Mr. Gude discussed both the CTIA and T-Mobile petitions for rulemaking that were filed in June seeking to reopen the Citizens Broadband Radio Service (CBRS) rulemaking. Mr. Gude made clear that significant effort and investment has already occurred for the CBRS band by companies from across the communications sector based on the current rules and that DSA would be opposed to any significant changes at this late date.

Mr. Gude also stressed the importance of ensuring the CBRS band retain the fundamental characteristics of the current rules by encouraging investment by entities at the edge of the network, including building owners, companies, campuses, stadiums, etc., noting that this type of investment was both inherently efficient and beneficial to traditional wireless operators. This type of investment would be all the more critical given the changing economics of cap ex investment for wireless operators after industry-wide movement to unlimited data plans.

Respectfully submitted,

Kalpak Gude  
President  
Dynamic Spectrum Alliance