



July 21, 2017

VIA ECFS

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

Re: Amendment of the Commission's Rules with Regard to Commercial
Operations in the 3550-3650 MHz Band, GN Docket No. 12-354;
Petitions for Rulemaking, RM-11788, -11789

Dear Ms. Dortch:

Sony Corporation ("Sony") submits the following comments on the petitions for rulemaking filed by CTIA and T-Mobile USA, Inc. in the above-referenced docket (the "Petitions").¹ Sony urges the Commission not to allow its disposition of those issues to delay timely deployment of 3.5 GHz services.²

Specifically, the Commission should not undertake rule changes that would result in new or different certification obligations for SAS administrators. Such changes would waste already invested resources, unnecessarily raise costs, and inevitably delay the SAS certification process. Like other commenters in this proceeding,³ Sony has devoted time and manpower based on the expectation that the Commission would remain committed to rules that it put in place over two years ago and reaffirmed just last year.

In addition, Sony disagrees with claims that allocating priority access licenses ("PALs") on a census tract basis will create unnecessary interference risks and unmanageable challenges for SAS administration.⁴ Although allocation by census tract requires somewhat more

¹ CTIA, Petition for Rulemaking, GN Docket No. 12-354 (filed June 16, 2017) ("CTIA Petition"); T-Mobile USA, Inc., Petition for Rulemaking, GN Docket No. 12-354 (filed June 19, 2017) (T-Mobile Petition).

² Sony has received conditional approval to serve as a spectrum access system ("SAS") administrator for wireless operations in the 3.5 GHz band. See Wireless Telecommunications Bureau and Office of Engineering and Technology Conditionally Approve Seven Spectrum Access System Administrators for the 3.5 GHz Band, Public Notice, DA 16-1426 (rel. Dec. 21, 2016).

³ See Letter from All Points Broadband, American Tower Corp., Amplex Internet, Baicells Tech, Boingo, Engine, Google, Inc., High Speed Link, Microsoft Corp., NCTA – The Internet & Television Association, Republic Wireless, Rise Broadband, Skywerx Internet Services, Smart City, Telrad Networks, and the Wireless Internet Service Providers Association to Chairman Ajit Pai, Commissioner Mignon Clyburn, and Commissioner Michael O'Rielly, GN Docket No. 12-354 (filed June 1, 2017).

⁴ See CTIA Petition at 9; T-Mobile Petition at 16.

sophisticated spectrum management than allocation by larger geographic units such as Partial Economic Areas, Sony's research and development efforts indicate that the difference between the two approaches is minor and entirely manageable with a sufficiently robust database implementation.

Respectfully submitted,

_____/s/_____
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