



July 24, 2019

**Via ECFS and Hand Delivery**

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

Womble Bond Dickinson (US) LLP

1200 Nineteenth Street, NW  
Suite 500  
Washington, DC 20036

t: 202.467.6900  
f: 202.467.6910

**Re: Performance Certification Results for a 3.5 GHz Spectrum Access  
System Provided for Testing by Amdocs, Inc.  
GN Docket No. 15-319**

Bob Silverman  
Attorney  
Direct Dial: 202-857-4532  
Direct Fax: 202-261-0082  
E-mail: [Bob.Silverman@wbd-us.com](mailto:Bob.Silverman@wbd-us.com)

Dear Ms. Dortch:

Amdocs, Inc. ("Amdocs"), by its counsel, submits the enclosed final report ("Final SAS Certification Test Report") from the U.S. Department of Commerce, National Telecommunications and Information Administration, Institute for Telecommunications Sciences ("ITS") presenting performance certification test results and observations on Amdocs' Spectrum Access System ("SAS"). Pursuant to Section 0.459 of the FCC's rules, Amdocs requests that the FCC withhold from public inspection and accord confidential treatment to marked portions of the confidential copy of the Final SAS Certification Test Report filed with the Office of the Secretary in the above-referenced proceeding as it contains commercial information, propriety business information, and/or trade secrets. Amdocs also files via ECFS the redacted version of the Final SAS Certification Test Report for public inspection.

Amdocs would like to thank ITS for conducting detailed and impartial testing. ITS tested conformance of the Amdocs SAS with the requirements of Part 96 of the FCC's rules. ITS leveraged the certification test system developed by the Wireless Innovation Forum ("WInnForum") through its standards development process and using configurations developed by WInnForum and the collaborating SAS Administrators and ITS themselves.

The results of the ITS laboratory testing confirms that the Amdocs SAS successfully completed all test configurations. The Amdocs SAS successfully passed all tests with no deficiencies noted, based upon the output of the test harness, as well as ITS's analysis of log files.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Best regards,

**Womble Bond Dickinson (US) LLP**

*/s/Robert A. Silverman*

Bob Silverman  
Attorney

Enclosures

**Spectrum Access System  
Certification Test Report and Appendices for  
FCC Part 96 Conformance for  
Amdocs, Inc.**