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VIA ELECTRONIC FILING

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

Re: Promoting Investment in the 3550-3700 MHz Band (GN Docket No. 17-258) and Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz (GN Docket No 17-183)

Dear Ms. Dortch:

On August 21, 2018, I met with Erin McGrath, Wireless Advisor to Commissioner Michael O’Rielly, and discussed the above referenced proceedings.

I reiterated Ruckus/ARRIS’ long-held position that rule changes to the 3.5 GHz CBRS band should be for the benefit of all the various industry sectors that have made significant investments towards operationalizing and commercializing the band, including mobile, cable, rural, industrial, and enterprise. We also discussed the enhancements to the “light-touch leasing” framework that Ruckus/ARRIS and others had made during the Comment and Reply Comment phases of the Notice of Proposed Rulemaking. I urged that those important leasing enhancements not be overlooked in any final rulemaking, while noting that Ruckus/ARRIS does not consider the secondary market mechanisms, including leasing, to be a substitute for rules on Priority Access License size and term that would support the widest possible range of use cases and deployment models.

I commended Commissioner O’Rielly’s leadership on unlicensed operation in the 5925 to 7125 MHz range and reiterated Ruckus/ARRIS’ support for a Notice of Proposed Rulemaking, noting that the demands for mid-band unlicensed spectrum continue to increase rapidly.

Sincerely,

David A. Wright

cc: Erin McGrath