



David Wright
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August 23, 2018

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)

Dear Ms. Dortch:

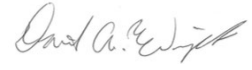
On August 22, 2018, I met with Michael Carowitz, Special Counsel to Chairman Ajit Pai, and discussed the above referenced proceeding.

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. I highlighted the May 29, 2018 ex parte filing in this proceeding in which Ruckus/ARRIS and a large group of stakeholders representing the cable, rural, industrial, and enterprise sectors had submitted a compromise proposal regarding changes to the Priority Access License (PAL) coverage areas.

We also discussed the enhancements to the "light-touch leasing" framework that Ruckus/ARRIS and others had proposed 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 PAL size and term that would support the widest possible range of use cases and deployment models.

I noted Chairman Pai's August 3, 2018 prepared remarks at the Resurgent Conference, Austin, TX in which the Chairman had pointed out *"the benefits that flow when the FCC steps back and puts its faith in the market"* and further highlighted how *"permissionless innovation made possible by competitive free markets that best guarantees consumer welfare."* Ruckus/ARRIS believes that these free market principles apply directly to the rule changes being contemplated for the CBRS band and urges the FCC to enact rules that will both foster innovation and allow market forces, not government regulations, to determine outcomes.

Sincerely,

A handwritten signature in dark ink, appearing to read "David A. Wright". The signature is fluid and cursive, with the first name "David" and last name "Wright" being clearly legible.

David A. Wright

cc: Michael Carowitz