

September 29, 2016

**VIA ELECTRONIC FILING**

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

**Re: Ex Parte Presentation**, Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System (SAS) Administrator(s) and Environmental Sensing Capability (ESC) Operator(s) Applications, GN Docket No. 15-319

On September 28, 2016, wireless industry representatives met with staff from the FCC's Wireless Telecommunications Bureau and Office of Engineering and Technology to discuss the treatment of information to be exchanged among Spectrum Access System ("SAS") administrators in the above-referenced proceeding (see Attachment for list of attendees).

During the meeting, several SAS administrator applicants, including Comsearch, CTIA, Federated Wireless and Google, shared with Commission staff the attached presentation, which describes the framework of an agreement to be executed between individual SAS administrators to govern how information exchanged between the SAS administrators may be used and the responsibilities of the SAS administrators to maintain information exchanged as confidential. The framework, developed after discussions with Commission staff and through individual discussions among SAS administrator applicants, is intended to facilitate a clear understanding and agreement regarding responsibilities as Administrators of Federal Communications Commission ("FCC")-certified Spectrum Access Systems.

The industry representatives submit that the agreement complies with FCC Part 96 rules and provides the necessary protections for SAS customers' proprietary and competitively sensitive information, as well as end users' private information. The framework will allow SAS administrators to:

- Share information among themselves necessary to assign frequencies in the 3.5 GHz band (3550-3700 MHz);
- Coordinate frequencies assigned in such a manner as to reduce the likelihood of harmful interference; and
- Resolve interference issues should they arise.

The industry representatives also indicated that they intend to introduce the framework agreement into the WInnForum working groups to facilitate coordination among other SAS providers and address implementation details.

Pursuant to Section 1.1206 of the Commission's rules, copies of this letter and slide presentation are being filed in ECFS and emailed to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Brian M. Josef

Assistant Vice President, Regulatory Affairs

CTIA®

Attachment

## September 28, 2016 Meeting Participants

### **Federal Communications Commission Attendees**

Jon Wilkins, WTB  
Julius Knapp, OET  
Paul Powell, WTB  
Becky Schwartz, WTB  
Thomas Derenge, WTB  
Navid Golshahi, OET  
Robert Pavlak, OET  
Matthew Pearl, WTB  
Ira Keltz, OET  
Kamran Etemad, WTB

### **Industry Representatives**

Stacey Black, AT&T  
Michael Goggin, AT&T  
Neeti Tandon, AT&T  
Mark Gibson, Comsearch  
Paul Anuszkiewicz, CTIA  
Brian Josef, CTIA  
David Primmer, Consultant for CTIA  
Megan Brown, Wiley Rein, Counsel for CTIA  
Kurt Schaubach, Federated Wireless \*  
Austin Schlick, Google  
Andrew Clegg, Google  
Gary Losee, Sprint

\* Joined via telephone

# SAS to SAS Information Sharing Agreement

Paul Anuszkiewicz

Vice President, Spectrum Planning

- Introduction
- Confidential Information
- CBSD Registration Information
- Use of Confidential Information
- Remedies and Term

- SAS administrators need to share information obtained from their customers with other SAS administrators in order to offer SAS service in compliance with FCC rules
- Information obtained by a SAS from its customers includes information that is proprietary, competitively sensitive, or relates to critical infrastructure
- FCC Part 96 rules require some registration information obtained from SAS customers to be made publicly available
- A number of SAS Administrator applicants have come together to propose a legal framework to govern how SAS to SAS information sharing will occur
- This presentation describes key terms of the Inter-SAS Agreement

Confidential Information is defined as:

- Non-Public Registration Data (obtained from CBSD registrations)
- Frequency assignment information: frequencies assigned to CBSDs by a SAS
- Interference level metrics: RSSI and BER from CBSDs provided to a SAS
- Other information designated in writing by the SAS providing the information

Confidential Information may not be disclosed by the recipient except:

- As required by the FCC in a binding, generally applicable public rule or order
- When compelled to do so by an order of the FCC, a court, or other controlling authority

Inter-SAS Agreement specifies two categories of CBSD Registration information:

1. Public Registration Data
  - FCC identification number
  - CBSD class (Category A/Category B)
  - Indoors or outdoors (For CAT A)
  - Requested authorization status (Priority Access or General Authorized Access),
  - Air interface technology
  - Sensing capabilities (if supported)
2. Non-Public Registration Data (All CBSD Registration Data which is not Public)
  - Call sign
  - CBSD Licensee name
  - Location of antenna (Latitude, Longitude, HAGL)
  - User contact information
  - Unique manufacturer serial number
  - Maximum EIRP
  - Antenna Characteristics and model

# Use of Confidential Information

Confidential Information may only be used by a SAS recipient for the limited purposes of frequency assignment and interference coordination in its role as a SAS Administrator

Confidential Information may not be used for any non-SAS purpose including:

- Consulting services
- Marketing, advertising or location based services
- Developing strategy with respect to or participating in spectrum auctions

SAS recipient of Confidential Information may not allow access to, disclose, sell or lease received Confidential Information for any non-SAS purpose - regardless of whether such Confidential Information has been aggregated or anonymized

## Remedies:

In the event a SAS Administrator recipient of Confidential Information fails to maintain confidentiality of Confidential Information, SAS Administrator discloser may:

- Seek injunctive relief and/or
- Seek appropriate action from the FCC

## Term:

- Recipient's duty to protect Confidential Information continues so long as Recipient retains the information, which is at least as long as required by FCC