

November 9, 2017

***FILED VIA ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

**Re:   *Ex Parte* Notification  
      GN Docket No. 17-183  
      RM-11791**

Dear Ms. Dortch:

On November 8, 2017, representatives of the Broadband Access Coalition (“BAC”) met with Commissioner Brendan Carr and Kevin Holmes, Acting Legal Advisor for Wireless and Public Safety; Commissioner Jessica Rosenworcel and Umair Javed, Legal Advisor; and Louis Peraertz, Senior Legal Advisor, Wireless, International, and Public Safety to Commissioner Clyburn. Representing the BAC were Jaime Fink, co-founder and Chief Product Office of Mimosa Networks, Inc. (“Mimosa”); Jimmy Carr, CEO of All Points Broadband, on behalf of the Wireless Internet Service Providers Association; Michael Calabrese, Director, Wireless Future Program, Open Technology Institute at New America, and the undersigned, counsel for Mimosa.

The BAC representatives discussed their proposal to amend and modernize the Commission’s Rules to enable deployment of high-throughput licensed point-to-multipoint fixed wireless broadband services in the 3700 – 4200 MHz band in a spectrally efficient manner, while protecting incumbent Fixed Satellite Service (“FSS”) and Fixed Service incumbents from harmful interference through the existing Part 101 frequency coordination process. The BAC representatives emphasized that shared access to the 3700 – 4200 MHz band would enable the rapid deployment of gigabit and near-gigabit broadband service to rural and other underserved areas. There was a discussion regarding the favorable economics of fixed wireless networks, which can be deployed at 25% or less of the capital expense of an all-fiber network, while offering comparable reliability and speeds. The representatives explained how their proposal would not preclude the provision of mobile services in the 3700 – 4200 MHz band and discussed possible solutions to promote coexistence in the band. Finally, the BAC representatives urged the Commission to act as soon as possible to gather accurate data from the FSS industry, and to require earth stations seeking interference protection to register by a date certain.

Please contact the undersigned if you have any questions.

Respectfully submitted,



Robert S. Koppel

cc (via e-mail):  
Kevin Holmes  
Umair Javed  
Louis Peraertz