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October 10, 2014

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: ***Notice of Ex Parte Presentation: Amendment of the Commission's Rules with
Regard to Commercial Operations in the 3550-3650 MHz Band***, GN Docket No.
12-354

Dear Ms. Dortch:

On October 8, 2014, Richard Engelman, Harry Perlow (via phone), and the undersigned of Sprint Corporation ("Sprint") met with John Leibovitz, Paul Powell, Kamran Etemad, and Brian Regan of the Wireless Telecommunications Bureau, as well as Julius Knapp, Robert Pavlak, and Navid Golshahi of the Office of Engineering and Technology, regarding the above-captioned proceeding.

During the meeting, Sprint commended the Commission's innovative efforts to overcome interference obstacles and promote greater commercial access to the underutilized 3550-3650 MHz band through a novel sharing framework.¹ The Commission's Spectrum Access System (SAS)-based proposals for the 3550-3650 MHz band represent promising advances in the Commission's approach to spectrum management.

Sprint reiterated points consistent with its filing in this proceeding, stressing that constructive approaches to enabling access to the 3550-3650 MHz band should not – and need not – come at the cost of important gains and investments made in the adjacent 3650-3700 MHz band.² Sprint discussed significant research, development, and deployment occurring in the 3650-3700 MHz band today under the Commission's successful Part 90, Subpart Z rules. Near-term small cell and small cell backhaul solutions in this band – as well as broader, non-SAS development work in Europe and Asia that could be harmonized with the 3650-3700 MHz band

¹ Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, *Further Notice of Proposed Rulemaking*, 29 FCC Rcd 4273 (Apr. 23, 2014) ("FNPRM").

² Comments of Sprint Corporation, GN Docket No. 12-354 (July 14, 2014).

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– would be undermined (if not entirely foreclosed) by application of the technical and service rules currently proposed for General Authorized Access (GAA) and/or Priority Access License (PAL) users in the 3550-3650 MHz band to licensees in the 3650-3700 MHz band.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Rafi Martina

Rafi Martina

Attorney

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Sprint Corporation

cc: (via e-mail)
John Leibovitz
Paul Powell
Kamran Etemad
Brian Regan
Julius Knapp
Robert Pavlak
Navid Golshahi