



October 15, 2014

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Communication: WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59

Dear Ms. Dortch:

On October 15, 2014, the undersigned of PCIA – The Wireless Infrastructure Association (“PCIA”) spoke via telephone with Chad Breckinridge in the Wireless Telecommunications Bureau.

In response to the Bureau’s inquiry, PCIA expressed its concern regarding the National Cable & Telecommunications Association’s (“NCTA”) proposal to exclude, partly or wholly, Part 15 services from Section 6409(a) of the Spectrum Act.¹ The record in the proceeding does not currently support such action.² PCIA also noted that it would be premature for the Commission to adopt NCTA’s proposal as the implications of exempting a single service or technology from Section 6409(a)’s application to “wireless” or “base station” have not been sufficiently developed either in the record or in NCTA’s proposal. PCIA urged the Commission not to adopt NCTA’s proposal.

¹ See Letter from Walter E. Anderson, Counsel to NCTA, to Marlene H. Dortch, Secretary, FCC, WT Docket Nos. 13-238, 13-32, WC Docket No. 11-59 (filed Oct. 11, 2014) (“NCTA Letter”).

² See Reply Comments of the National Cable and Telecommunications Association, WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59, RM-11688, at 1-4 (Mar. 5, 2014); Reply Comments of Cox Communications, Inc., WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59, RM-11688, at 3-5 (Mar. 5, 2014).

Pursuant to Sections 1.1204 and 1.1206 of the FCC's rules, this notice will be filed via ECFS and a copy will be provided via email to the attendee. Please contact the undersigned with any questions.

Sincerely,



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CC: Chad Breckinridge