

Trey Hanbury
Partner
Hogan Lovells
T: 202.637.5534
trey.hanbury@hoganlovells.com

December 23, 2014

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

Re: ***Ex Parte Notice***
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:

The attached presentation provides proposed technical rules that would enable point-to-multipoint ("PmP") non-line-of-sight ("nLOS") backhaul applications in the 3.5 GHz Band while protecting other 3.5 GHz Band users and adjacent-channel operations. In particular, BLiNQ Networks, Inc. ("BLiNQ") proposes a spectrum mask that would allow operators, including PMP nLOS backhaul operators, to deploy using wider channels (e.g., 20 MHz) while limiting in- and out-of-band emissions to protect adjacent-channel operators from harmful interference. Similarly, BLiNQ proposes incorporating protections for C-Band Earth stations into the Spectrum Access System ("SAS") to protect earth station operations from harmful interference while enabling more efficient use of the 3.5 GHz Band. Additionally, a potential limit of, for example, six subtending remote fixed terminals and, for example, a limit of 120 degrees on the horizontal beamwidth of any single or group of PMP hub radios can prevent deployments of high-power omnidirectional systems under rules intended to allow for PMP nLOS deployments.

The types of small cells planned for 3.5 GHz Band will not operate without backhaul connectivity to the Internet. While high-capacity, fiber connections will be available for some sites, many, if not most, small cells will lack ready access to high-capacity wireline data connections and will need wireless connectivity to backhaul data traffic. Less stringent constraints on operations of point-to-multipoint backhaul can accelerate commercial deployment of small cell infrastructure in the 3.5 GHz band¹ without causing harmful interference or otherwise degrading performance of other users in and adjacent to the 3.5 GHz Band. BLiNQ's proposals in the attached presentation make

¹ Relaxing the Commission's proposed power limits from 30 dBm/10 MHz to 40 dBm/10 MHz would greatly increase throughput and substantially lower the time and cost of deployment. See Letter from Trey Hanbury, Counsel to BLiNQ Networks, Inc., to Marlene Dortch, Secretary, FCC, Docket No. 12-354 (Nov. 20, 2014).

more efficient use of the available spectrum while protecting 3.5 GHz Band and adjacent-band users from harmful interference.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to BLiNQ Networks, Inc.

Cc: Kamran Etemad
Navid Golshahi
Chris Helzer
Julius Knapp
John Lambert
John Leibovitz
Bob Pavlak
Paul Powell
Brian Regan