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February 24, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *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 February 20, 2015 Iyad Tarazi and Kurt Schaubach of Federated Wireless, Inc. met with Joyce Jones, John Leibovitz, Wayne Leighton, Paul Powell, and Robert Pavlak of the Wireless Telecommunications Bureau. Ira Keltz of the Office of Engineering and Technology joined the meeting by telephone.

Federated Wireless began with an update on the Spectrum Sharing Committee recently established by the Wireless Innovation Forum to advance standards for the 3.55 GHz band. Federated Wireless noted that the Committee is already benefiting from broad multi-stakeholder participation, which includes commercial carriers interested in deploying in the band, equipment manufacturers, spectrum database providers, sensor system vendors, and incumbents. For example, at the most recent Committee meeting commercial carriers exchanged views with other stakeholders on how Priority Access Licenses (PALs) should be managed by a Spectrum Access System (SAS) to make optimal use of those frequencies. Federated Wireless believes that information exchange of this manner, through a multi-stakeholder forum, will lead to standards that maximize utility of 3.55 GHz spectrum while encouraging new and innovative uses.

In the meeting, Federated Wireless further reiterated its strong support for rules proposed by the Commission in the Further Notice of the above-referenced proceeding. Federated Wireless emphasized the benefits that will result from a flexible frequency assignment framework for both the PAL and General Authorized Access (GAA) tiers. Federated Wireless discussed that a dynamic SAS can most effectively protect incumbent operations in 3.55 GHz while satisfying PAL and GAA needs for frequency assignments when the SAS is afforded the ability to assign frequencies throughout the entire band. Static frequency assignments for PALs will provide no discernable benefit for incumbent protection and will likely reduce overall spectrum utilization.

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Finally, Federated Wireless shared perspectives on how commercial opportunities for SAS providers may evolve and stressed the importance for an open and competitive marketplace. Federated Wireless expressed concern that if a SAS is permitted to be tightly coupled with network infrastructure, such as integrated with the packet core of an LTE network, then open interfaces and rigorous certification standards need to be set such that barriers to competition or other anti-competitive practices do not arise.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

/s/ Kurt Schaubach  
Kurt Schaubach  
Chief Technology Officer  
Federated Wireless, Inc.

Cc: Joyce Jones  
Ira Keltz  
John Leibovitz  
Wayne Leighton  
Paul Powell  
Robert Pavlak