



Quality Internet Services Wherever You Are

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February 25, 2015

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Unlicensed and TV White Spaces Deployment
ET Docket No. 14-165; GN Docket No. 12-268; GN Docket No.
12-354; GN Docket No. 12-268
Oral and Written Ex Parte Presentation

Dear Ms. Dortch:

Ken Garnett, Chief Technology Officer of Cal.net, met yesterday with Commissioner Michael O'Reilly to discuss the successes of and the remaining issues concerning TV White Spaces, including the issues pending issues before the FCC in the above-referenced dockets. Mr. Garnett discussed with Commissioner O'Reilly the importance of FCC rules and decisions that: (a) encourage spectral efficiency in the unlicensed spectrum bands; (b) provide for exclusion zones when the FCC opens up new unlicensed spectrum bands; (c) provide for TV White Spaces guard bands that are as narrow as feasible to promote full unlicensed use of the TV White Spaces; (d) rules that protect TDWR, (e) rules that allow additional operational flexibility for WISPs serving rural areas, including higher transmit power for equipment serving rural areas and the allowance of directional antennae specification and recognition. Further, Mr. Garnett explained to Commissioner O'Reilly the White Spaces deployment of Cal.net in rural California, its plans for network expansion in those areas using TV White Spaces, NII-U, and 3.65 and 3.55 GHz technologies, as well as its success using Carlson Wireless Technology's TV White Spaces equipment. A summary of Cal.net's TV White Spaces deployment and its near-term network expansion plans is attached.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

Respectfully submitted,

/s/

Mark O'Connor, Board Member

cc: Julius Knapp