

March 13, 2015

**VIA ELECTRONIC FILING**

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

Re: *Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap* (ET Docket No. 14-165); *Promoting Spectrum Access for Wireless Microphone Operations* (GN Docket No. 14-166); *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions* (GN Docket No. 12-268)

Dear Ms. Dortch,

On March 11, 2015, Scott Bergmann and Krista Witanowski of CTIA – The Wireless Association®, together with CTIA outside counsel and consultants, and CTIA members had separate meetings with Erin McGrath (advisor to Commissioner Michael O’Rielly), Brendan Carr (advisor to Commissioner Ajit Pai), and Priscilla Delgado Argeris (advisor to Commissioner Jessica Rosenworcel). A full list of meeting attendees is attached. Wireless industry representatives discussed testing conducted by V-COMM, Inc. that examined potential interference from white space devices and wireless microphones to 600 MHz licensed mobile broadband services.

CTIA supports rules that maximize the repurposing of spectrum for licensed exclusive use in the 600 MHz band and provide for unlicensed use of the 600 MHz guard band and duplex gap, consistent with the Spectrum Act’s requirements. Specifically, the Spectrum Act emphasizes that the “Commission may not permit any use of a guard band that the Commission determines would cause harmful interference to licensed services.”<sup>1</sup> Therefore, in accordance with the Spectrum Act unlicensed operations in the 600 MHz guard band and duplex gap can only be introduced through a regulatory framework that ensures that such operations do not raise interference concerns.

To develop a framework for unlicensed white space devices and wireless microphones that would ensure protection of licensed services from interference, CTIA and its members commissioned V-COMM to test interference from these sources to licensed mobile broadband devices. In the meeting, CTIA members/representatives and V-COMM discussed the results of V-COMM’s testing, a summary of which is attached.

---

<sup>1</sup> Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, § 6407(e) (codified at 47 USC §1452), 126 Stat. 156 (2012) (“Spectrum Act”).

Marlene H. Dortch  
February 27, 2015  
Page 2

CTIA is committed to promoting a 600 MHz frequency environment where licensed and unlicensed services can coexist without harmful interference. The wireless industry representatives at the meeting stressed that the Commission can enable this environment through careful consideration of V-COMM's testing and adoption of rules consistent with CTIA's and V-COMM's proposals.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office. Please direct any questions to the undersigned.

Sincerely,

/s/ Krista L. Witanowski

Krista L. Witanowski  
AVP, Regulatory Affairs  
CTIA-The Wireless Association®

Attachments

**Attachment**  
**March 11, 2015 Meeting Participants**

**Meeting with Erin McGrath, Legal Advisor, Wireless, Public Safety and International  
(Office of Commissioner Michael O’Rielly)**

Scott Bergmann, Vice President, Regulatory Affairs, CTIA  
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA  
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.\*  
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)  
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)  
Brian Benison, AT&T\*  
Darryl Degruy, U.S. Cellular\*  
Leora Hochstein, Verizon  
Harry Perlow, Sprint\*

**Meeting with Brendan Carr, Legal Advisor, Wireless, Public Safety, and International  
(Office of Commissioner Ajit Pai)**

Scott Bergmann, Vice President, Regulatory Affairs, CTIA  
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA  
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.\*  
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)  
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)  
Brian Benison, AT&T\*  
Darryl Degruy, U.S. Cellular\*  
Leora Hochstein, Verizon  
Chris Mills, Intern, Office of Commissioner Ajit Pai  
Harry Perlow, Sprint\*  
Max Solondz, Verizon\*  
Neeti Tandon, AT&T\*

**Meeting With Priscilla Delgado Argeris, Senior Legal Advisor (Office of Commissioner  
Jessica Rosenworcel)**

Scott Bergmann, Vice President, Regulatory Affairs, CTIA  
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA  
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.\*  
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)  
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)  
Brian Benison, AT&T\*  
Darryl Degruy, U.S. Cellular\*  
Leora Hochstein, Verizon  
Harry Perlow, Sprint\*

\* - participated via teleconference.