



QUALCOMM Incorporated

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April 9, 2015

**Via ECFS**

Ms. Marlene 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 April 7, 2015, John Kuzin and the undersigned of QUALCOMM Incorporated met separately with Brendan Carr, Legal Advisor to Commissioner Pai, Erin McGrath, Legal Advisor to Commissioner O'Rielly, and Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn, about the above-referenced proceeding. Earlier today, we met with Renee Gregory, legal advisor to Chairman Wheeler to discuss this proceeding.

During these meetings, Qualcomm expressed support for the Commission applying its longstanding and highly successful policy of technology neutrality in adopting rules for the 3.5 GHz band. Qualcomm urged the FCC to reject the requests made by various parties to prohibit deployment of any particular version of the so-called LAA/LTE-U technology in the proposed GAA tier in the band, technology that Qualcomm and other companies successfully demonstrated at the recent Mobile World Congress in Barcelona, Spain. Qualcomm explained that there is no sound legal or policy justification for the Commission to prohibit any technology in this band, and that the agency's policy of technology neutrality, in both licensed and unlicensed bands, has been a cornerstone of the success of the American wireless industry, enabling American consumers to enjoy a full range of wireless applications, services, and devices, often delivered via a variety of competing technologies.

Respectfully submitted,

Dean R. Brenner  
Senior Vice President, Government Affairs

cc: Brendan Carr  
Renee Gregory  
Erin McGrath  
Louis Peraertz