



601 Pennsylvania Ave., NW
Suite 800
Washington, DC 20004
202-654-5900

April 9, 2015

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Notice of Ex Parte Presentation

WT Docket No. 12-354, Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band

Dear Ms. Dortch:

On April 7, 2015, John Hunter and I, both of T-Mobile US, Inc. ("T-Mobile"), met with Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn; Travis Litman, Legal Advisor to Commissioner Rosenworcel; Erin McGrath, Legal Advisor to Commissioner O'Rielly; and Brendan Carr, Legal Advisor to Commissioner Pai; and on April 8, 2015, we met with Renee Gregory, Legal Advisor to Chairman Wheeler, in each case regarding the above-referenced proceeding.

During each meeting, we urged the Commission to adopt rules governing Priority Access Licenses ("PALs") in the 3550-3650 MHz band (the "3.5 GHz band") that will encourage investment in the spectrum. In particular, we stated that PAL spectrum assignments should be static and not controlled by the spectrum access system ("SAS") database because, among other reasons, current network technology does not support dynamic spectrum assignments. We also asserted that license terms should be longer than the Commission proposed and that there should not be opportunistic access to PAL spectrum by General Authorized Access ("GAA") users once a PAL licensee has deployed service. We urged the Commission to promote competition among entities seeking PALs by limiting potential applicants to three (3) licenses of 10 megahertz each.

We explained that rules should be technologically neutral and not disfavor LTE unlicensed ("LTE-U") or Licensed Assisted Access ("LAA") technology. We pointed out that Wi-Fi and LAA can coexist by each technology permitting similar, not superior, access to GAA spectrum. The Commission's technology neutral approach to spectrum has been highly successful and has enabled new technologies and spectrum efficient innovation, and it should not deviate from that tenet here.

Finally, we urged the Commission to adopt a competitive framework for SAS database providers under which, among other things, PALs should be permitted to act as their own SAS. In any case, SAS databases should not be permitted to share competitively sensitive data. The role of the SAS should be appropriately limited. Devices and network operators will inform the SAS when they use or relinquish a channel; the SAS will assess channel availability based on this information as well as through direct channel sensing. Operators and devices will check the SAS to find available channels, but final channel selection and operation should be controlled by the operator.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. A copy of this letter is also being provided to FCC staff that participated in each meeting.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey
Chief Engineering and Technology Policy, Federal
Regulatory Affairs

cc: (each electronically)
Louis Peraertz
Travis Litman
Erin McGrath
Brendan Carr
Renee Gregory