

April 30, 2015

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Notice of Ex Parte Presentation

IB Docket No. 13-213, RM-11685, Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems

ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

ET Docket No 14-165, 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

Dear Ms. Dortch:

On April 29, 2015, Edgar Figueroa, President and CEO, Greg Ennis, Vice President, Technology, and Kelly Davis-Felner, Vice President, Marketing, all of Wi-Fi Alliance, and the undersigned counsel for Wi-Fi Alliance, met with the staff of the Office of Engineering and Technology copied on this letter regarding the above referenced proceedings.

We urged the Commission not to authorize, at this time, a terrestrial low power service ("TLPS") in the 2473-2495 MHz band. We stated that the results of the demonstrations conducted by Globalstar at Commission facilities failed to provide conclusive information. We noted that the scheduling was rushed, organization was lacking, and participants in the demonstrations were rebuffed when they asked if operating parameters others than those presented could be used. Absent meaningful results, Wi-Fi Alliance remains concerned that the proposed TLPS will cause interference to Wi-Fi systems beyond that contemplated by Part 15 of the Commission's rules.

We noted the increased use of the 5 GHz band by Wi-Fi devices and that additional spectrum capacity in that band is required. We pointed out that the 5 GHz band can be used to help develop Internet of Things ("IoT") applications and for wideband devices that make use of IEEE 802.11(ac) standards. We urged the Commission to take action to make the 5850-5925 MHz band (the "5.9 GHz Band") available for unlicensed devices.

Finally, we urged the Commission to adopt rules that would maximize the amount of unlicensed spectrum available in the 600 MHz bands. We expressed confidence in the ability of databases

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to manage spectrum access and asked the Commission to reject claims that unlicensed operations would cause harmful interference to licensed services.

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. Please direct any questions regarding this filing to the undersigned.

Very truly yours,

/s/ Russell H. Fox

Russell H. Fox

cc: (each electronically)
Julius Knapp
Geraldine Matisse
Paul Murray
Jamison Prime
Aspasia Paroutsas
Karen Rackley
Hugh Van Tuyl
Rodney Small
Serey Thai