1805 29th Street, Suite 2050
Boulder, CO 80301

May 18, 2015

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

Re: *Terrestrial Use of the 2473-2495 MHz Band– IB Docket No. 13-213*

Dear Ms. Dortch:

On behalf of Zayo Group Holdings, Inc. ("Zayo"), I write to request that the Federal Communications Commission move forward to adopt its proposed rules in the referenced proceeding in order to provide much needed additional mobile broadband capacity in the 2.4 GHz band.

Zayo is a global provider of bandwidth infrastructure services, including dark fiber, live video, wavelengths, SONET, Ethernet, IP and colocation services. Our network footprint extends over 84,000 route miles, with connectivity on dense metro and intercity fiber assets. Zayo was founded in 2007 and is headquartered in Boulder, Colorado, with European headquarters in London and Paris. Zayo's network serves eight countries and 46 states, plus Washington D.C. The network connects the largest U.S. and European cities, as well as many Tier 2–5 U.S. markets. Zayo's network reaches approximately 17,500 buildings, including over 800 data centers, nearly 4,000 cell towers, and over 10,000 enterprise buildings.

Our mission is to accelerate our customers' capabilities to enrich, entertain, teach, protect, and inspire the people of the world by providing enormous bandwidth and connectivity over our exceptional network infrastructure.

Globalstar's proposed Terrestrial Low Power Service offering would provide a significant increase in additional wireless network capacity. The TLPS offering would help alleviate bandwidth congestion on existing shared spectrum. We understand Globalstar recently demonstrated at the Commission's own headquarters how the addition of its TLPS offering could increase wireless network capacity by 40%. These improvements would positively contribute to Zayo fulfilling its corporate mission.

Thank you for your consideration.

Sincerely,

Scott Reardon
Vice President, Corporate Development