



July 16, 2015

Via Electronic Filing

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

Re: Notice of Ex Parte Communication: 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, 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; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On July 15, 2015, Alan Norman, Austin Schlick, and I of Google Inc. held teleconferences with Howard Symons of the Commission's Incentive Task Force, as well as with Julius Knapp, Ira Keltz, and Geraldine Matise of the Commission's Office of Engineering and Technology.

In each of these conversations, we discussed the importance of making three usable channels available for unlicensed use in the broadcast bands and repurposed 600 MHz band. We emphasized that placing a broadcaster in the duplex gap between licensed wireless uplink and downlink operations would make it more difficult to meet that goal. To that end, we suggested that if the Commission decides to place a broadcaster in the duplex gap in some markets, it should find alternative low-band spectrum for unlicensed use in the impacted market.

We also noted that unlicensed access to TV Channel 37, wherever achievable without harmful interference to protected WMTS and radio astronomy locations, is likewise critical to reaching the three-channel minimum requirement nationwide. To that end, we advocated that the Commission should establish conservative but reasonable protection areas for wireless medical telemetry users, without allowing protection contours for atypical sites to serve as the default for all sites. To provide wireless medical telemetry users an additional measure of confidence that their operations will be protected, we suggested that the Commission establish a timely means for these users to expand protection in the event that they experience interference at a particular site. For example,

authorized personnel at a wireless medical telemetry facility could directly notify a white spaces database that they have sound reason to believe they are experiencing interference from unlicensed white space devices into their systems, which would trigger an expansion of the protection zone for a finite period of time (e.g., two weeks). During the time when the expanded perimeter is in place, facility managers could work with a database administrator and Commission staff, if needed, to determine the source of the suspected interference and make any necessary adjustments to the protection area for a particular site. If the issue can be resolved without making adjustments to the protection area, then the protection area would revert to its original size and shape. We believe that this approach, combined with conservative but reasonable protection zones, provides appropriate protection to wireless medical telemetry users while enabling significant use of Channel 37 by unlicensed devices. We also encouraged the Commission to commit to revisiting its rules for protecting medical telemetry users after it has gained experience with white spaces devices successfully operating on the same channel.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

A handwritten signature in blue ink that reads "Aparna Sridhar".

Aparna Sridhar
Counsel
Google Inc.

cc: *Via electronic mail*
Gary Epstein
Howard Symons
Julius Knapp
Ira Keltz
Geraldine Matisse