

July 22, 2015

Ex Parte

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

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions; 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, and 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, GN Docket No. 12-268, ET Docket No. 14-165

Dear Ms. Dortch:

On July 21, 2015, Austin Schlick of Google Inc., Alan Norman of Google Inc. (via telephone), and I met with Erin McGrath, Legal Advisor to Commissioner O'Rielly. We discussed the importance of the Part 15 rules being considered by the Commission on providing a foundation for a successful 600 MHz band. Specifically, we discussed that (1) analysis provided by Google and Broadcom demonstrates that unlicensed devices can operate in the duplex gap without causing harmful interference to LTE licensees; (2) analysis provided by Google demonstrates that unlicensed devices can operate in channel 37 without causing harmful interference to incumbents; and (3) the FCC should require unlicensed devices to report their location accuracy to the database for use in calculating exclusion zones rather than adopting a specific accuracy-level rule. On July 21, 2015, I spoke via telephone with Julius Knapp, Chief of the Office of Engineering and Technology, and discussed the same matters.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced proceedings. If you require any additional information please contact the undersigned.

Sincerely,



Paul Margie
Counsel to Google Inc.

cc: meeting participants