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VIA ELECTRONIC FILING

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

Re: Ex Parte – *Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Information on Current Trends in LTE-U and LAA Technology*, ET Docket No. 15-105

Dear Ms. Dortch:

Federated Wireless, Inc. submits this brief letter to call attention to important decisions the Federal Communications Commission (the “Commission”) made with respect to band-wide operability and technology neutrality in the Citizens Broadband Radio Service (the “Citizens Band”).

Federated Wireless agrees with the Commission’s finding that band-wide operability is “crucial to promote competitive access to the band, encourage innovation, foster the development of a diverse equipment ecosystem, and ensure that the band is made available for a wide variety of innovative uses by an array of potential users.”¹ As Federated Wireless has emphasized, band-wide operability is critical to ensuring that *all* prospective users of the band have access to the same equipment, devices, and technological capabilities.²

Federated Wireless believes that a diverse equipment ecosystem will arise in the Citizens Band as long as the Commission’s rules for the band remain technology-neutral. As Federated Wireless has noted, a global LTE ecosystem already exists at 3.5 GHz, and the Commission should encourage expansion of this ecosystem to the Citizens Band.³ To this end, the only measure for the usability of a given wireless access technology in the band

¹ *Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959, ¶ 228 (2015).

² See, e.g., Letter from Kurt Schaubach, Federated Wireless, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-354, Notice of Ex Parte, at 4 (April 8, 2015).

³ See, e.g., Letter from Kurt Schaubach, Federated Wireless, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-354, Notice of Ex Parte, at 9 (March 4, 2015).

should be compliance with Part 96 rules, which impose technical requirements for devices operating in the Citizens Band.⁴

In creating the Citizens Band, the Commission established a three-tiered, shared spectrum framework enabled by a Spectrum Access System (“SAS”). The SAS optimizes frequency use to maximize capacity and enable coexistence for licensed – not unlicensed – access by both licensed Priority Access and licensed-by-rule General Authorized Access users. The Citizens Band is thereby distinct from conventional unlicensed band allocations, and concerns regarding the use of LTE technology in unlicensed bands are not relevant in the Citizens Band.

Respectfully submitted,

_____/s/_____
Kurt Schaubach
Chief Technology Officer
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⁴ See, e.g., 47 C.F.R. §§ 96.39 – 96.51.