

November 4, 2015

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

Re: *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. 13-49
Written Ex Parte Presentation

Dear Ms. Dortch:

On October 20, 2015, representatives of the wireless and critical infrastructure industries met with Office of Engineering and Technology ("OET") staff to discuss proposed changes to Part 15 of the Commission's rules for the 5725-5850 MHz U-NII bands.¹ During that meeting, the parties discussed Alternative 3 of a proposal submitted to the Commission by Ubiquiti Networks, Inc. ("Ubiquiti") in its July 2, 2015 ex parte notice.² Industry representatives proposed a modification to Alternative 3 that would slightly relax allowable out-of-band emissions ("OOBE") in the 25 megahertz of spectrum closest to the band edges.

Following the meeting, industry representatives have had several internal meetings to fully discuss and define additional refinements to Alternative 3. These discussions have resulted in the modified proposal attached as Exhibit 1 hereto. The industry representatives seek approval of the Ubiquiti Alternative 3 proposal, with minor changes to the OOBE limit **only** in the five megahertz of spectrum closest to the U-NII-3 band edges (*i.e.*, 5720-5725 MHz and 5850-5855 MHz). This refined proposal is shown with blue lines in the attached exhibit. **All signatories to this letter approve of the refined proposal and ask that the Commission adopt it.**

If the Commission has any concerns about whether the attached proposal provides an appropriate level of interference protection, the industry representatives respectfully request that the Commission not reject their proposal as a whole, but rather consider the OOBE requirements at the lower and upper edges of the band independently. For example, if the Commission determines that the proposed OOBE level in the 5850-5855 MHz range does not provide sufficient interference protection, it should adopt the remainder of the proposal and consider other alternatives for frequencies above 5850 MHz.³

¹ See Letter from Alcatel-Lucent, *et al.*, to Marlene H. Dortch, FCC Secretary, ET Docket No. 13-49 (filed Oct. 22, 2015).

² See Letter from Catherine Wang and Timothy Bransford, Counsel to Ubiquiti, to Marlene H. Dortch, FCC Secretary, ET Docket No. 13-49 (filed July 2, 2015), Slide 17.

³ The parties note that Fastback Networks submitted a proposal regarding OOBE above 5850 MHz. See Letter from Henry Goldberg, Fastback Networks Counsel, to Marlene H. Dortch, FCC Secretary, ET Docket No. 13-49 (filed June 22, 2015).

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

Alcatel-Lucent
Cambium Networks, Ltd.
Fastback Networks
JAB Wireless, Inc.
Mimosa Networks, Inc.
Ubiquiti Networks, Inc.
Zebra Technologies
Wireless Internet Service Providers Association

Enclosure

cc: Julius Knapp
Mark Settle
Karen Rackley
Aole Wilkins

Exhibit 1

Modified Proposal for Out of Band Emissions of 5.8 GHz

