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Straight Path Communications,
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April 4, 2016

VIA ELECTRONIC FILING

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

Re: Notice of *Ex Parte* Presentation

GN Docket No. 14-177, *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*

On March 31, 2016, Jerry Pi, Chief Technology Officer, and Fassil Abebe, radiofrequency engineer, both of Straight Path Communications, Inc. (“Straight Path”), Russell Fox of Mintz Levin and I conducted a single meeting with the following members of the Commission’s staff regarding the above referenced proceeding:

Wireless Telecommunications Bureau:

- Blaise Scinto
- Brian Regan
- Catherine Schroeder (by phone)
- Charles Oliver (by phone)
- Christopher Helzer
- John Schauble
- Matthew Pearl
- Nancy Zaczek (by phone)
- Simon Banyai (by phone)
- Stephen Buenzow (by phone)
- Tim Hilfiger (by phone)

Office of Engineering and Technology:

- Bahman Badipour
- Barbara Pavon (by phone)
- Michael Ha
- Serey Thai

International Bureau:

- Jose Albuquerque
- Kal Krautkramer (by phone)

In our meeting, we continued to urge the Commission to license millimeter wave band spectrum in larger geographic areas to facilitate wide area networks. We reiterated our position that, while several parties in the proceeding asserted that millimeter wave spectrum would likely be used for small-cell applications, the Commission’s rules should not make small-cells the *de facto* use case by creating small license areas. We provided additional details about Straight Path’s proposal that the Commission permit a period in advance of any auction of 39 GHz band spectrum for licensees to engage in a channel

exchange program. Supplemental information about that plan is contained in the attached materials that were distributed to Commission staff in advance of the meeting. We emphasized that Straight Path's plan would be easy to administer, would not require a "closed auction" of mutually exclusive applicants, and would enable both incumbent licensees and the Commission (and ultimately geographic area license winners) to maximize the utility of spectrum through contiguous channel blocks.

We noted that the proposed channel exchange program would have an impact on incumbent licensees' obligation to demonstrate substantial service. Accordingly, we reiterated our request that the Commission permit incumbent licensees to demonstrate that they satisfy the substantial service requirement early, with flexibility to potentially terminate or modify service during the transition to 5G.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and sent to each member of the Commission's staff with whom we met. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Davidi Jonas

Davidi Jonas
CEO and President
Straight Path Communications, Inc.

cc: (via e-mail, with attachments, to all Commission staff noted above)

Attachments