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May 24, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

**Re: *Oral Ex Parte Notice*
GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95;
RM-11664; and WT Docket No. 10-112**

Dear Ms. Dortch:

On May 20, 2016, representatives of The Boeing Company (“Boeing”) hosted Commissioner Mignon Clyburn on a tour of Boeing’s aircraft manufacturing facility in North Charleston, South Carolina. A list of the Boeing officials that participated in discussions with Commissioner Clyburn during the tour is provided as an attachment to this letter.

During the tour, the discussion touched on the importance of studying and facilitating co-primary spectrum sharing in the 37.5-40.0 GHz band between very high data-rate satellite communications systems, including ubiquitously deployed satellite user terminals, and the proposed Upper Microwave Flexible Use (“UMFU”) service. It was emphasized that satellite communications systems operating in the 37.5-40.0 GHz band will be able to provide very high data-rate communications services to every location in the country, including the most rural and remote areas, immediately upon their initiation of service. In contrast, UMFU proponents have acknowledged that UMFU systems may never provide service to consumers outside of dense urban areas. To quote a recent CTIA filing,

the primary opportunity for mmW deployment is in areas with the greatest population density. This is due to the fact that mmW spectrum is unlikely to deliver extensive coverage in a market but

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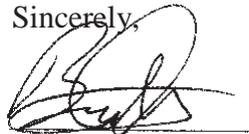
instead will be best suited to providing capacity via small cells and backhaul, particularly in densely populated areas.¹

Given industry acknowledgment that UMFU services may never exist outside the most densely populated urban areas, it would be exceedingly inefficient to designate the 37.5-40.0 GHz band solely for UMFU without concurrently facilitating spectrum sharing throughout the United States, including urban areas, with co-primary, receive-only satellite user terminal operations.

During the tour, Boeing officials also identified the need for additional unlicensed spectrum resources in the 64-71 GHz band for advanced manufacturing and for the ability to use the 57-71 GHz band for unlicensed wireless passenger services onboard aircraft.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott
Counsel to The Boeing Company

Attachments

¹ Letter from Scott K. Bergmann, Vice President, Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177, et al. (May 20, 2016).

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Boeing Attendees

- Beverly Wyse – Vice President and General Manager of Boeing South Carolina (“BSC”)
- Lindsay Leonard – Senior Director, National Strategy and Engagement, BSC
- Audrey Allison – Senior Director, Frequency Management Services
- Tommy Preston, Jr. – Director, National Strategy and Engagement, BSC
- Warren Helm – Director, Assembly Quality, Training & Compliance, BSC
- Brad Elmenhurst – Director, Engineering Systems and Boeing IT Executive, BSC
- Chevon Fuller – Senior Counsel, BSC
- JJ Johnston – Spectrum Management, BSC