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November 16, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**BY HAND DELIVERY**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: ***Notice of Ex Parte Communication: WT Docket No. 99-168***

Dear Ms. Salas:

This letter is being filed on behalf of Cisco Systems, Inc. ("Cisco"). On 15 November 1999, Greg Raleigh and Bruce Mehlman of Cisco, and undersigned counsel, met with Stagg Newman, Doug Sicker, Sean White, and Paul Marrangoni of the Office of Engineering and Technology to discuss issues raised in the *Notice of Proposed Rulemaking* issued in the above-referenced proceeding.

In this meeting, Cisco expressed the following views:

1. The 746-806 MHz band is perfectly suited for the provision of high-speed, low-cost Internet access services by terrestrial fixed systems, particularly in rural areas.
2. The FCC should not adopt auction and licensing rules that effectively preclude the use of this spectrum for such services.
3. To this end, the FCC should auction off a single 36 MHz license (18 MHz x 18 MHz) in each geographic market, and permit this license to be used for either fixed or mobile wireless services. The Commission should further allow the spectrum to be channelized or disaggregated by the licensee.
4. The FCC need not, and should not, establish guard bands to protect public safety users of adjacent spectrum. Rather it should establish whatever out-of-band emission

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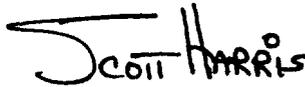
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limits are necessary to protect the public safety spectrum -- and let the licensees choose the means to meet those limits.

5. Auctioning 36 MHz licenses will also allow more immediate rollout of high-speed Internet access because service providers will be better able to work around those broadcasters currently using Channels 60-69.

Please direct any questions regarding this notification to me.

Respectfully submitted,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is stylized with a large, sweeping initial "S" and the name "HARRIS" written in a slightly larger, more prominent font than "SCOTT".

Scott Blake Harris

cc: Stagg Newman  
Doug Sicker  
Sean White  
Paul Marrangoni