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November 18, 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 November 17, 1999, Greg Raleigh and Bruce Mehlman of Cisco, and undersigned counsel, met with Ari Fitzgerald, legal advisor to Chairman Kennard, 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. ***Indeed, it is critical that the Commission not auction licenses that are materially smaller than 36 MHz -- for doing so will effectively preclude the use of this spectrum for high-speed broadband access.***
4. The FCC should not auction a single nationwide license, but rather should auction licenses covering large geographic areas. However, it is the amount of spectrum included in the license, rather than the size of the licensed area, that will be most

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critical in determining whether this spectrum can be used to provide high-speed, low-cost Internet access.

5. The FCC should not carve out a portion of this spectrum for private corporate use at the expense of public access to the Internet. Private corporate networks do not require private spectrum. Commercial service providers can create, and will create at market prices, virtual private networks.
6. 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 limits are necessary to protect the public safety spectrum – and let the licensees choose the means to meet those limits.

Please direct any questions regarding this notification to me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Wiltshire". The signature is fluid and cursive, with a prominent initial "W".

William M. Wiltshire

cc: Ari Fitzgerald