



March 11, 2013

Via Electronic Filing

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

Re: Notice of Ex Parte Communications: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Docket No. 12-268; *Request by Progeny LMS, LLC for Waiver of Certain Multilateration Location and Monitoring Service Rules*, WT Docket No. 11-49

Dear Ms. Dortch:

On March 7, 2013, I met with Alex Hoehn-Saric, Policy Director for Commissioner Jessica Rosenworcel, and David Goldman, Senior Legal Advisor to Commissioner Rosenworcel. I discussed Google's support for an incentive auction framework that frees up spectrum for both licensed and unlicensed uses. In particular, I indicated that unlicensed operation should be permitted in the guard band(s)/duplex gap, channel 37, and the two broadcast channels currently reserved exclusively for the use of wireless microphones.

We also discussed the Commission's proceeding addressing Progeny LMS, LLC's request to use the 902-928 MHz band for licensed high-power transmitters that may interfere with millions of lower-powered unlicensed devices already operating in that band. Consistent with Google's prior advocacy,¹ I stated that allowing Progeny to operate as proposed would impair one of the few existing unlicensed designations under 1 GHz and undermine the Commission's progress toward freeing up high-quality spectrum for unlicensed uses.

Separately, I made the same points regarding the *Progeny* proceeding in a phone conversation with Julius Knapp, Bureau Chief of the Office of Engineering and Technology, on March 8, 2013.

¹ See Letter from Aparna Sridhar to Ruth Milkman and Julius Knapp, *Request by Progeny LMS, LLC for Waiver of Certain Multilateration Location and Monitoring Service Rules*, WT Dkt. 11-49 (Jan. 29, 2013).

Google Inc. Ex Parte
Dkt. 12-268 and WT Dkt. 11-49
March 11, 2013

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,



Aparna Sridhar
Telecom Policy Counsel
Google Inc.

cc: Alex Hoehn-Saric (by electronic mail)
David Goldman (by electronic mail)
Julius Knapp (by electronic mail)