



April 26, 2013

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

RE: GN Docket No. 12-268; RM-11685; WT Docket No. 11-49; GN Docket No. 12-354

Dear Ms. Dortch:

On April 24th, David Tennenhouse and Paula Boyd of Microsoft met with Commissioner Ajit Pai and Courtney Reinhard, his Legal Advisor, and separately with Commissioner Mignon Clyburn and her Legal Advisor, Louis Peraertz. In both meetings, Mr. Tennenhouse discussed the growing demand for broadband and the importance of using spectrum more efficiently through techniques such as dynamic spectrum sharing and leveraging databases.

During the meeting with Commissioner Pai and Ms. Reinhard, Mr. Tennenhouse discussed the importance of ensuring that spectrum is available nationwide in the TV bands for unlicensed use, including in guard bands and the duplex gap. (In our comments in the incentive auction proceeding, we expressed support of unlicensed designations in the duplex gap, the guard band, the two channels reserved for wireless microphone use, remaining TV white spaces and any “remainder” spectrum.) Microsoft also raised concerns about interference to unlicensed uses in the 2.4 GHz band and the 900 MHz band if the Globalstar petition in RM-11685 or the Progeny petition in WT Docket No. 11-49 were adopted. Consistent with our comments in GN Docket No. 12-354, Mr. Tennenhouse expressed support for the Commission’s proposals for innovative small cell use in the 3.5 GHz band, which would establish a General Authorized Access tier while protecting incumbent federal users.

During the meeting with Commissioner Clyburn, Mr. Tennenhouse again expressed support for the Commission’s 3.5 GHz proposal. He highlighted the importance of not enlarging the Priority Access tier to the detriment of the General Authorized Access tier. As Mr. Tennenhouse explained, assigning sufficient spectrum to the General Authorized Access tier offers a better opportunity to introduce products and services into the marketplace, because consumer electronics manufacturers will easily and quickly be able to develop and introduce products as they have done in unlicensed bands.

Please contact me if you have any questions or require additional information.

Respectfully Submitted,

/s/

Paula Boyd
Director, Government and Regulatory Affairs
Microsoft Corporation

Cc: Commissioner Mignon Clyburn
Commissioner Ajit Pai
Louis Peraertz
Courtney Reinhard