



September 20, 2013

**VIA ELECTRONIC FILING**

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

**Ex Parte Presentation**

**GN Docket No. 13-185**

**Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands**

Dear Ms. Dortch:

On September 20, 2013, Douglas C. Smith, CEO; Randy Clark, VP-Special Projects; Janice Obuchowski, and Jay Chauhan, all representing Oceus Networks Inc. ("Oceus Networks"), met with John Leibovitz, Deputy Bureau Chief, Wireless Telecommunications Bureau (WTB); Julius Knapp, Chief, Office of Engineering and Technology (OET); Blaise Scinto, Division Chief, Broadband Division, WTB; Peter Daronco, Deputy Chief, Broadband Division, WTB; Tom Peters, Chief Engineer, WTB; Janet Young, Engineer, WTB; Brian Regan, Legal Advisor, WTB; Renee Gregory, Chief of Staff, OET; Mark Settle, Chief, Policy and Rules Division, OET; Michael Ha, OET; CPT Bryant Wellman, OET; and Garth Hahn, OET.

During the meeting, Oceus Networks provided an overview of comments filed in the above-referenced proceeding. Oceus Networks discussed the benefits of adapting commercial 4G LTE technologies to military tactical uses and the need for access to commercial roadmap frequencies to achieve these benefits. Representatives from Oceus Networks acknowledged the FCC's notice asking about a bi-directional sharing framework that could provide to U.S. military users access to the band pairing, 1755-1780 MHz and 2155-2180 MHz.

Representatives from Oceus Networks highlighted various benefits of this access, including supporting spectrum requirements domestically to train on systems before they are deployed overseas in operation and for fulfilling the military requirements for tactical cellular capabilities that can enable high-bandwidth tactical applications. Oceus Networks also highlighted access to a commercial ecosystem of devices, chipsets, and networking equipment; being aligned with a commercial technology roadmap; and, enabling roaming arrangements with commercial carriers both domestically and internationally as other benefits.

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Representatives from Oceus Networks noted that its filing proposes geographically, limited access to this frequency pair on remote bases and training ranges. Oceus Networks representatives discussed possible approaches the FCC and the NTIA could take to implement this sharing including using population thresholds at the county level, primary and secondary allocations, identifying geographic locations where this sharing could apply, and/or changes to FCC regulations and to the NTIA Manual of Regulations and Procedures for Federal Radio Frequency Management (Redbook).

Respectfully submitted,

/s/ Jay Chauhan  
Jay Chauhan

cc: John Leibovitz  
Julius Knapp  
Blaise Scinto  
Peter Daronco  
Tom Peters  
Janet Young  
Brian Regan  
Renee Gregory  
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