



September 27, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th St. SW
Washington DC 20554

RE: **EX PARTE** in Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band ET Docket No. 13-49

Dear Ms. Dortch:

On September 26, 2013, Paul Sinderbrand of Wilkinson Barker Knauer, and Cisco representatives Peter Ecclesine and myself met with the following Office of Engineering staff members concerning the above captioned docket: Julie Knapp, Renee Gregory, Karen Rackley, Geraldine Matisse, and other staff members.

Cisco summarized its comment in the docket, and urged the Commission to move forward with a prompt order resolving the Part 15 issues on which there is little or no dispute, and to resolve the use of the 5600-5650 MHz band. Cisco stated that the resolution of these issues would constitute a meaningful advancement of use of the band, and that it mattered less if the Commission wants to adjust the rules relative to its proposal in the Notice, than it does to resolve the rules promptly. Cisco stated its belief that the record amassed in the docket gives the Commission a clear opportunity to bring the 5600-5650 MHz issue to conclusion and that it should do so.

Cisco also reported on progress made in solving for sharing requirements with respect to the U-NII-4 band, and noted the various proposals that have been raised to date. Cisco provided a high level briefing of its proposal for sharing with the Intelligent Transportation System. The proposal needs to be further developed, but could become a basis for testing U-NII operations with ITS radios.

Cisco discussed industry contributions to the ITU-R process, which is the locus of conversations around potential sharing in the U-NII-2B band. Cisco noted that the work to date has largely involved industry-government collaboration around modeling to determine at what power level U-NII devices might operate without interfering with incumbent users. This is useful work that must be completed.

Work that has not been done is whether there are additional mitigation techniques that could be used in order to allow U-NII operations at higher powers. Cisco noted that industry has conceptual mitigation proposals it is bringing into the ITU-R process, and hopes that this work can progress also.

Cisco also noted its preference for a U-NII-1 resolution that would allow higher power to be used in conjunction with U-NII-2A or U-NII-3, and urged the Commission to work through the issues that would lead to this result.

Sincerely,

CISCO SYSTEMS, INC.

By: Mary L. Brown
Director, Cisco Government Affairs
601 Pennsylvania Ave. NW 9th Fl. North
Washington, D.C. 20004
(202) 354-2923

Attachments

VNI Slides

Band Plan

One page summary of
candidates for a First Report and Order

Cisco U-NII-4 proposal