



December 10, 2013

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

RE: **EX PARTE** in Amendment of Parts 0, 1, 2, and 15 of the Commission's Rules regarding Authorization of Radiofrequency Equipment and Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications, ET Docket No. 13-44; 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; Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems, IB Docket No. 13-213 RM-11685

Dear Ms. Dortch:

On December 6, 2013, Dave Case and I met with Rashmi Doshi and Bill Hurst at the FCC Lab.

Cisco discussed its view that Docket No. 13-44, which proposes to revise how the FCC will utilize Telecommunications Certificated Body (TCB) program, as well as how the TCBs will be regulated and supervised, represents an important opportunity to continue to improve the equipment certification process. Cisco stated that there is substantial record support for the FCC's reform proposals. In addition, based on Cisco's analysis in our annual Visual Networking Index, and our work with the Wi-Fi Alliance, we noted the likelihood for a significant uptick in numbers of devices that will be presented for certification. A streamlined and improved system would greatly enhance the FCC's ability to stay in front of the wave of device applications.

In addition, Cisco inquired to what extent the FCC Lab would be ready with new certification rules relative to a future report and order in the 5 GHz docket. Cisco urged FCC staff to consider if there are testing issues not within the purview of the rulemaking that could be raised and addressed with industry so that equipment certification can begin soon after the full Commission reaches a

decision. One item discussed was out of band emissions from U-NII-2A into U-NII-1, and how industry should address the OOB issues for IEEE 802.11ac equipment that utilizes broad channelization (e.g., 80 MHz). Staff noted that the OOB issue is similar to the issues raised in IB Docket No. 13-213 and the impact on Channel 11 in the 2.4 GHz band, and recommended that industry consider the two examples together for the purpose of formulating positions in future filings. Cisco staff indicated that would do so.

Sincerely,

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