



WASHINGTON, DC

STEPHEN E. CORAN  
202.416.6744  
SCORAN@LERMANSENTER.COM

March 20, 2014

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

Re: *Expanding the Economic and Innovation Opportunities of Spectrum  
Through Incentive Auctions*  
GN Docket No. 12-268

*Amendment of the Commission's Rules with Regard to Commercial  
Operations in the 3550-3650 MHz Band* GN Docket No. 12-354

*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

*Amendment of Parts 2 and 90 of the Commission's Rules to Create a New  
Frequency Allocation for Wireless Broadband Services*  
RM-11715

Dear Ms. Dortch:

On March 18, 2014, representatives of the Wireless Internet Service Providers Association ("WISPA") met with personnel from the Commission's Office of Engineering and Technology ("OET") to discuss a number of ongoing proceedings. Attending on behalf of WISPA were Alex Phillips (Treasurer and FCC Committee Chair), Elizabeth Bowles (Legislative Committee Chair) and undersigned counsel. Attending on behalf of OET were Julius Knapp, Geraldine Matise, Ira Keltz, Hugh Van Tuyl, Paul Murray, Bruce Romano, Karen Rackley, Aole Wilkins and Mark Settle (by telephone).



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***Incentive Auctions Proceeding (GN Docket Nos. 12-268 and 13-385)***

The WISPA representatives noted that TV white space deployments are ramping up as equipment certified with geolocation databases is produced, shipped and installed. The WISPA representatives further explained the propagation benefits and cost-effectiveness of unlicensed spectrum below 1 GHz as other unlicensed bands become more congested and consumer use of broadband expands.

The WISPA attendees emphasized the need for (a) 24 megahertz of *nationwide* unlicensed spectrum to support standard-based chipset development, and (b) 30 megahertz of *contiguous regional* white space spectrum following the re-packing of the TV band. It was emphasized that contiguous spectrum would be the product of re-packing that minimizes the amount of channels adjacent to TV stations that would be unavailable for fixed unlicensed use under current Commission rules. The WISPA representatives also expressed strong support for “use it or share it” rules that would allow unlicensed white space operations to continue post-auction when and where licensed operations had not commenced.

***3550-3650 MHz Proceeding (GN Docket No. 12-354)***

WISPA indicated its strong support for the Revised Framework proposed by the Commission for the 3550-3650 MHz band. In particular, WISPA favors a three-tier Spectrum Access System (“SAS”) that incorporates dynamic frequency assignment, higher power and flexible use within geographic areas and short-term Priority Access licenses with reasonable spectrum and duration limits. The WISPA representatives reiterated WISPA’s position that existing 3650-3700 MHz licensees should be accorded Priority Access status.

***5 GHz Proceeding (GN Docket No. 13-49)***

With respect to the 5150-5250 MHz band, the WISPA representatives expressed support for the positions espoused by the National Cable & Telecommunications Association in its recent ex parte notices. WISPA also urged the Commission to retain both Section 15.407 and 15.247 rules for operation in the 5725-5850 MHz band given the benefits that unlimited gain point-to-point antennas can bring to rural communities. WISPA indicated its support for enhanced security features in 5 GHz devices that would limit the potential for harmful interference to Terminal Doppler Weather Radio facilities.

***10 GHz Proceeding (RM-11715)***

The WISPA representatives urged the Commission to adopt a Notice of Proposed Rulemaking regarding to allocate unlicensed spectrum in the 10 GHz band. WISPA noted the potential for WISPs and others to gain access to more than 400 megahertz of additional spectrum at costs that are expected to be lower than licensed links in the 11 GHz band. WISPA also stated



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that equipment manufacturers were already producing equipment for 10 GHz operations for international use.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen E. Coran', with a long horizontal flourish extending to the right.

Stephen E. Coran

cc: Julius Knapp  
Geraldine Matisse  
Ira Keltz  
Hugh Van Tuyl  
Paul Murray  
Bruce Romano  
Karen Rackley  
Aole Wilkins  
Mark Settle