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April 4, 2014

Via Electronic Filing

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

Re: Notice of Ex Parte Communication: *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354

Dear Ms. Dortch:

On April 2, 2014, Milo Medin, Johanna Shelton, and I, of Google Inc., met with Commissioner Jessica Rosenworcel and her Senior Legal Advisor, David Goldman. We discussed the FCC's proposal to open the 3550-3700 MHz band for sharing by commercial users. We urged that the Commission adopt rules for the band that are consistent with the following principles:

- Adherence to the three-tiered framework proposed by the President's Council of Advisors on Science and Technology (PCAST);
- Broad eligibility for the secondary (priority access) tier of users;
- General authorized access wherever priority access reservations are not in use;
- Designation of priority access reservation areas that match, as closely as possible, the boundaries of actual spectrum use;
- Management by a spectrum access database;
- Calculation of exclusion zones based on small-cell deployment and to protect only federal users rather than commercial entrants; and
- Lightweight, fast, and flexible auction mechanisms where mutually exclusivity cannot otherwise be avoided by voluntary mechanisms such as technical coordination.

We also provided an update on Google Fiber, including potential expansion to additional cities and entry barriers.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

Austin C. Schlick
Director, Communications Law
Google Inc.

cc: *Via Electronic Mail*
Commissioner Jessica Rosenworcel
David Goldman