



jdesimone@telecomlawpros.com
202.789.3116

April 15, 2014

78051.00002

VIA ELECTRONIC FILING COMMENT SYSTEM

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

Re: Notice of Ex Parte Communication – *In the Matter of 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 14, 2014, Melissa Glidden Tye, Head of Federal Policy, Motorola Mobility LLC (“Motorola Mobility”) and Dr. Alexander Gerdenitsch, Radio Spectrum Engineer, Motorola Mobility and Jessica DeSimone of Telecommunications Law Professionals PLLC, met with Louis Peraertz, Legal Advisor to Commissioner Clyburn.

During the meeting, Motorola Mobility stressed the importance of interoperability throughout the entire 3550-3700 MHz band, explaining that interoperability would benefit consumers by improving choice and quality by enabling consumers to port their devices between service providers and enabling devices to roam on different networks.

Motorola Mobility also reiterated its support for flexible technical rules that would facilitate LTE and WiFi implementation throughout the 3550-3700 MHz band and promote international harmonization of wireless broadband spectrum allocations, which also would benefit consumers through economies of scale.

Motorola Mobility further discussed the importance of harmonizing the 3.5 GHz band with existing defined 3GPP bands. Currently, one-half of the 3550-3700 MHz band (3550-3600 MHz) is within 3GPP Band 42, and the other half (3600-3700 MHz) is within Band 43. Motorola Mobility expressed its continued support for the development of a band plan that places channels fully within either 3GPP Band 42 or Band 43.¹ The FCC should avoid a band plan for 3550-3700 MHz where any single channel spans both Band 42 and Band 43 (e.g., from 3595-3605 MHz) or that contains any technical rules incompatible with current 3GPP bands. Motorola Mobility urged that these

¹ Motorola Mobility has previously advocated for 10 MHz unpaired channels to achieve this goal. *See* Comments of Motorola Mobility LLC, 9 (filed Dec. 5, 2013).



Marlene H. Dortch
April 15, 2014
Page 2

considerations should be included in any proposed rules and addressed prior to adopting any final rules.

This notice is being filed in the above-referenced docket for inclusion in the public record. Please contact the undersigned with any questions.

Sincerely,

/s/ Jessica DeSimone

Jessica DeSimone
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Louis Peraertz