

April 24, 2014

Ex Parte

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*

Dear Ms. Dortch:

On April 22, 2014, Rahul Patel, Vice President and General Manager of Wireless Connectivity, Vijay Nagarajan, Director of the Mobile Computing Wireless Connectivity Business, Vinko Erceg, Senior Technical Director of Systems Design Engineering, and Christopher Szymanski, Director of International Government Relations of Broadcom Corporation (“Broadcom”) and I spoke via telephone with Julius Knapp of the Office of Engineering and Technology and John Leibovitz of the Wireless Telecommunications Bureau regarding the above-referenced docket.

During this meeting, Broadcom discussed the importance of 6 MHz channels that enable broadband operations with close to 40 mW of transmit power consistent with the TV White Space rules. Specifically, Broadcom explained that, although some use cases for unlicensed operations could be met through smaller bandwidth and/or lower transmit powers, the use cases most interesting to Broadcom’s customers and end user consumers would drop off if transmit power were significantly reduced.

Broadcom also explained that, in the event the auction produces new channel configurations based on a guard band and duplex gap sizes between 10-12 MHz, Broadcom would endeavor to find ways to maximize usage of all the resulting spectrum that is available for unlicensed operations. However, without a sufficient number of ubiquitous 6 MHz channel units allowing close to 40 mW transmit power, the costs of developing technology to use the new channel configurations will likely be inordinately high, use cases would be limited, and if requirements are peculiar to the US market, then the return on investment likely would not justify developing products to use such spectrum.

Ms. Marlene H. Dortch

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Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information please contact the undersigned.

Sincerely,

/s/ Rob Carter

S. Roberts Carter

Counsel for Broadcom Corporation

cc: meeting participants