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May 5, 2014

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

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

Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On May 1, 2014, representatives of the Wireless Internet Service Providers Association ("WISPA") met with John Leibovitz, Paul Powell, Brian Regan, Kamran Etemad, Navid Golshani and John Lambert (via telephone) to discuss issues related to the above-referenced rulemaking proceeding. In addition to undersigned counsel, the WISPA representatives included Elizabeth Bowles, Chuck Hogg, Alex Phillips and Richard Harnish.

WISPA noted its general support for the rules proposed in the recently adopted Further Notice of Proposed Rulemaking for the 3550-3650 MHz band<sup>1</sup> regarding the three-tiered Spectrum Access System ("SAS"), higher power operation in rural areas, the set-aside of 50 percent of the band for General Authorized Access and "use it or share it" opportunistic use of the band where Priority Access licensees are not operating. WISPA stated its belief that the size of geographic zones required to protect federal radar use could be reduced. WISPA also suggested that the SAS could include additional features that would enable more flexible deployments, including the ability of the SAS to incorporate directional antenna patterns. WISPA indicated that it was studying other technical proposals and issues related to the ability of the SAS to enforce interference protection rights and the potential transition of the 3650-3700 MHz band into the regulatory scheme that would be adopted for the 3550-3650 MHz band.

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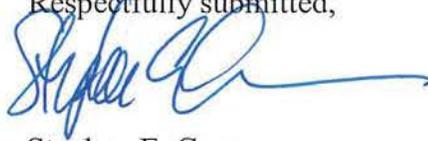
<sup>1</sup> *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, Further Notice of Proposed Rulemaking, GN Docket No. 12-354, FCC 14-49 (rel. Apr. 23, 2014).

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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,



Stephen E. Coran  
*Counsel to the Wireless Internet Service  
Providers Association*

cc: John Leibovitz  
Paul Powell  
Brian Regan  
Kamran Etemad  
Navid Golshani  
John Lambert