

June 20, 2014

Ex Parte

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

Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114;

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

Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands, GN Docket No. 13-185

Dear Ms. Dortch:

On June 18, 2014, Kris Rinne, Chair of the Board of Governors of 4G Americas, Chris Pearson, President of 4G Americas, and I met with Ruth Milkman, the Commission's Chief of Staff, and Renee Gregory, a legal advisor in the Chairman's office. Later that day, Chris Pearson and I met with Commissioner Pai and his Legal Advisor, Brendan Carr.

In addition, on June 19, 2014, Mr. Pearson and I held separate meetings with Commissioner Clyburn and her Legal Advisor Louis Peraertz; Commissioner Rosenworcel and her Senior Legal Advisor David Goldman; and Admiral David Simpson, Chief of the Public Safety and Homeland Security Bureau (PSHSB), along with Deputy Bureau Chief David Furth (by phone), and Timothy May of the Policy Division of the PSHSB.

In the meeting with PSHSB, we discussed the Commission's proposals for improving the accuracy of wireless indoor location for E911 calls, in PS Docket No. 07-114. Specifically, 4G Americas noted the advantages of using the standards process for rolling out new location technologies, the various technology approaches that seem capable of improving the accuracy of wireless indoor location information, and the importance of avoiding any mandate—either explicitly or implicitly—of a proprietary technology standard.

4G Americas made these same points with respect to improving indoor wireless E911 location accuracy when meeting with the Chief of Staff, the Commissioners, and the Legal Advisors. In addition, in these 8th floor meetings, 4G Americas discussed with respect to the 3.5 GHz proceeding, GN Docket No. 12-354, how improvements in the LTE standards and deployments of small cells will improve the resistance of wireless networks to interference and make it possible to have dramatically smaller exclusion zones. We noted specifically that LTE now has enhanced interference cancellation (eICIC) technology for handsets that can facilitate sharing,

and Self-Optimizing Networks (SON) that allow operators to dynamically shift network assets, greatly reducing the likelihood of incumbents causing interference to mobile broadband.

With respect to the AWS-3 proceeding, GN Docket No. 13-185, 4G Americas noted that eICIC and SON make it possible to reduce exclusion zones in this band as well. Finally, we noted that success in the AWS-3 proceeding will require clarity and realistic assumptions in the federal agencies' transition plans.

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

Sincerely,

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cc: Commissioner Pai
Commissioner Clyburn
Commissioner Rosenworcel
Ruth Milkman
Renee Gregory
Brendan Carr
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Admiral David Simpson
David Furth
Timothy May