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August 22, 2014

*Via ECFS*

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

**Re: *Revision of Part 15 of the Commission's Rules to Permit  
Unlicensed National Information Infrastructure (U-NII)  
Devices in the 5 GHz Band, ET Docket No. 13-49***

**Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On August 21, 2014, Cambium Networks, Ltd. ("Cambium") met with the Office of Engineering and Technology's Julius Knapp, Mark Settle, Aole Wilkins, Karen Rackley, and Geraldine Matisse. Representing Cambium were Scott Imhoff, Vice President of Product Management; Mark Thomas, Systems Engineering Manager; and Cambium's counsel, David Kaufman and Jonathan Allen of Rini O'Neil, PC.

The meeting concerned the FCC's decision in this proceeding to tighten the Out-of-Band Emissions Limit for devices operating at 5.725-5.825 GHz and Cambium's Petition for Reconsideration of this decision. Cambium explained that the company supports the FCC's adoption of stricter security measures and enforcement of the technical rules to protect against harmful interference, particularly to Terminal Doppler Weather Radar facilities. The OOBE rule change as written, however, would harm rural broadband deployments by adding significant costs to products that use this spectrum band. Cambium has identified in the record how cost increases would result both in terms of per-unit cost and in terms of the cost of additional equipment such as access points that would be needed to compensate for reduced product performance. The result would severely harm the ability of Internet service providers to deploy broadband in rural areas where long-range 5.8 GHz links are essential for delivering service.

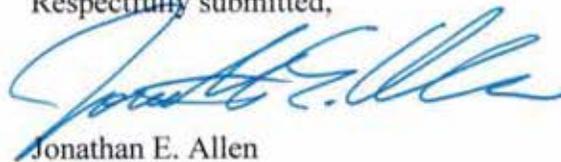
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Cambium noted the significant support in the record from service providers, equipment manufacturers and others for Cambium's Petition for Reconsideration. We also discussed ways to address interference concerns raised by federal agencies such as the Federal Aviation Administration and the Department of Transportation about the impact on operation of their systems in the 5 GHz band. We discussed costs and effects of different kinds of filtering or other techniques to limit OOBE. Cambium has committed to continuing its technical and cost analysis of these issues, to modelling alternative scenarios and to further outreach with the FCC's Office of Engineering and Technology.

Cambium supports retention of the Section 15.247 standard of the Commission's rules, as noted in Cambium's Petition for Reconsideration in this proceeding.

Respectfully submitted,



Jonathan E. Allen

Attachment

cc: Julius Knapp  
Mark Settle  
Karen Rackley  
Aole Wilkins  
Geraldine Matisse