



September 15, 2014

Via Electronic Filing

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

Re: Notice of Ex Parte Communication: *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 September 11, 2014, Milo Medin, Tibor Boros, Paul Husted, Peter Murphy, Nia King-rubie, Maisie Clark, and I, of Google Inc., met in Mountain View, California, with Commissioner Michael O'Rielly and his Legal Advisor, Erin McGrath. We discussed the FCC's proposal to open the 3550-3700 MHz band for sharing by commercial users. In particular, we explained the capability of Google's prototype spectrum access system (SAS) to mediate among government radar systems, other incumbent users, and two tiers of authorized commercial users by enforcing protection rules and avoiding harmful interference. We explained that the SAS avoids conflicts between different categories of users and enables market-based usage of otherwise underutilized spectrum. We noted the SAS's ability to enforce spectrum rights that are assigned by census block or smaller registration units. We urged that the Commission should set baseline requirements for SASs but allow SAS providers to innovate and differentiate among themselves in offering more sophisticated technologies that enable increased spectrum utilization. Finally, we stressed the importance of moving quickly to finalize rules for shared use of the 3.5 GHz band and for prompt processing of applications for certification of SASs, so that providers can take advantage of a commercial ecosystem for the band that is now taking shape.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Staci R. Pies".

Staci R. Pies
Sr. Legal Counsel
Google Inc.

cc: *Via Electronic Mail*
Commissioner O'Rielly
Erin McGrath