

Sept. 19, 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 September 17, 2014: (1) Michael Daum of Microsoft Corporation and I met with Erin McGrath, Legal Advisor for Commissioner O’Rielly; (2) Paula Boyd of Microsoft Corporation, Mr. Daum, and I met with Brendan Carr, Legal Advisor for Commissioner Pai; (3) Aparna Sridhar of Google Inc., Ms. Boyd, Mr. Daum, and I met with Louis Peraertz, Legal Advisor for Commissioner Clyburn; and (4) Austin Schlick of Google Inc., Alan Norman of Google Inc. (via telephone), Ms. Sridhar (via telephone), Ms. Boyd, Mr. Daum, and I met with Julius Knapp of the Office of Engineering and Technology (“OET”), Serey Thai (OET), Hugh Van Tuyl (OET), Geraldine Matisse (OET), Paul Murray (OET), Rashmi Doshi (OET, via telephone), Gary Epstein of the Incentive Auction Task Force (“IATF”), Howard Symons (IATF), William Scher (IATF), AJ Glusman (IATF), John Leibovitz of the Wireless Telecommunications Bureau, Joyce Bernstein of the Media Bureau, and Alison Neplokh of the Media Bureau. On September 18, 2014, Mr. Daum and I met with Commissioner Jessica Rosenworcel and David Goldman, Legal Advisor to Commissioner Rosenworcel.

In these meetings, we discussed the importance of adopting technical rules that would permit the use of three 801.11af channels in the 600 MHz band. To accomplish this goal, we discussed: (1) enabling operation of Mode 1 and 2 personal/portable unlicensed devices in the duplex gap, lower guard band, and Channel 37; (2) allowing the database to determine unlicensed device operation based on the device’s location-accuracy capabilities so that devices with better accuracy can operate in appropriate locations, rather than preserving the current rule, which mandates that all devices establish location within +/- 50 meters; (3) allowing databases to use the Longley-Rice propagation model to calculate interference protection for broadcast operations; (4) permitting unlicensed systems to determine areas where devices may operate in the broadcast band by using both the database and sensing approach; and (5) allowing Mode 1 and 2 personal/portable unlicensed devices to operate below Channel 21.

Pursuant to the FCC’s rules, I have filed a copy of this notice electronically in the above-referenced proceeding. If you require any additional information please contact the undersigned.

Sincerely,



Paul Margie

cc: meeting participants