November 10, 2015

VIA ECFS

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

Re: Sony Corporation
Sony Electronics Inc.
Notice of ex parte presentation
GN Docket No. 12-354

Dear Ms. Dortch:

On November 6, 2015, Naotaka Sato and Sho Furuichi of Sony Corporation, Chen Sun of Sony (China) Limited, and Bill Carney and the undersigned from Sony Electronics Inc. (together, “Sony”), met with Brian Regan, Bob Pavlick, Paul Powell, Kamran Etimad, Becky Schwartz, and Chris Helzer (by telephone) of the Wireless Bureau, and Ira Keltz and Navid Golshani of the Office of Engineering and Technology, to discuss the above-referenced proceeding.

The presentation by the Sony representatives consisted primarily of arguments already reflected in the Sony’s written comments in this proceeding, specifically:

• The Commission should use an aggregate measurement of interference by General Authorized Access (“GAA”) users to enforce Priority Access License (“PAL”) incumbent protection;

• The Commission should use existing standards to coordinate frequency assignment among multiple Spectrum Access Systems (“SAS”);

• Sony suggests the use of existing standards that have been designed to address the “equitable and coordination challenges” in limiting GAA use; and

• SAS standardization should occur at international standards development organizations.
In addition, the Sony representatives expressed support for arguments made by Google in opposition to certain petitions for reconsideration in this proceeding, specifically that:

- The Commission should continue to permit professional installers to report CBSD positioning and also allow devices to provide geolocation accuracy information to SAS providers; and

- SAS providers should not be required to perform additional, detailed validation of location data.¹

The Powerpoint presentation made by the Sony representatives during the meeting is included as an attachment to this notice. The embedded video on page 9 of the presentation shows that as few as three transmitters can adversely affect DTV signal reception.

This notice is submitted pursuant to Section 1.1206 of the Commission’s rules. Please contact the undersigned with any questions.

Sincerely,

/s/ Jim Morgan

________________________
Jim Morgan
Director and Counsel
Sony Electronics Inc.
james.morgan@am.sony.com
202-429-3651

Attachment

cc: (via electronic mail)
    Brian Regan
    Bob Pavlick
    Paul Powell
    Kamran Etimad
    Becky Schwartz
    Chris Helzer
    Ira Keltz
    Navid Golshani