April 10, 2015

VIA ELECTRONIC FILING

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

Re: 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:

Ruckus Wireless, Inc. ("Ruckus") submits this letter provide its support for opening up the 3.5 GHz Citizens Broadband Service band for innovative spectrum sharing and small cell wireless broadband use. As the Commission observed in the Notice of Proposed Rulemaking, "the new Citizens Broadband Service could help address the ongoing capacity shortage and promote new innovations in broadband technology, deployment, and spectrum management." Ruckus believes that the Commission’s proposal for Contained Access Facilities ("CAF") is a very important innovation opportunity for the 3.5 GHz band and has the potential to stimulate substantial new investment in wireless infrastructure serving the enterprise.

As a pioneer and leading provider of wireless infrastructure solutions for the enterprise, Ruckus is keenly aware of the challenges enterprises face in achieving reliable, high-bandwidth connections indoors. While the flexible licensing framework and eligibility criteria for the 3.5 GHz band will produce significant public interest benefits, Ruckus believes that the spectrum needs of the enterprise which we believe should be broadly defined to include entities such as schools, hotels, convention centers, general office spaces, and others warrant specific attention. Such enterprises are unlikely to be interested in Priority Access Licenses and such use by the enterprise does not achieve the Commission’s broader goal for increased spectrum access and efficiency. Conversely, while the General Authorized Access ("GAA") tier does provide broad access to spectrum in the 3.5 GHz band, investment in wireless systems for the enterprise are unlikely without some certainty that sufficient spectrum is available, on a reserved basis, to fully serve the facility.

The CAF proposal has the potential to attract significant investment, from non-traditional sources, in wireless infrastructure using the 3.5 GHz band. It will allow enterprises to provide services with reserved spectrum according to their specific needs, and such isolated
and localized use of spectrum can be accommodated without significantly impacting the availability of spectrum within the GAA pool.

Respectfully submitted,

Steve Martin
Senior Vice President/GM Emerging Technologies
Ruckus Wireless, Inc.