December 18, 2013

Via Electronic Filing

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


Dear Ms. Dortch,

On December 17, 2013, the incNETWORKS® leadership team met with individuals from the Office of Engineering & Technology and the Wireless Telecommunications Bureau. Consistent with our comments from the meeting, regarding the appropriate geographic units for PALs, PAL allocation should go down to the building level (i.e., micro-POP). Spectrum (for PALs) should be auctioned using an “e-Lease” concept; e-Lease owner determined on a “first come, first served” basis assuming infrastructure ability has been established via successful database entry and proof of infrastructure operation.

The Commission should make a consistent amount of spectrum, specifically 80 MHz, available for PAL use (20 MHz for GAA use)\(^1\); do not allow spectrum overlap between PAL and GAA. Lastly, recommend orthogonal time-slice sharing for the resolution of co-channel interference, requiring coordination between PALs within multi-tenant and/or building-to-building environments.

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

Respectfully Submitted,

incNETWORKS®

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\(^1\) If 3650 – 3700 MHz is included (150 MHz total), recommend 120 MHz allocated for PAL usage and 30 MHz for GAA use; 20 MHz bands for Tier II and 10 MHz bands for Tier 3.