March 13, 2015

VIA ELECTRONIC FILING

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


Dear Ms. Dortch,

On March 11, 2015, Scott Bergmann and Krista Witanowski of CTIA – The Wireless Association®, together with CTIA outside counsel and consultants, and CTIA members had separate meetings with Erin McGrath (advisor to Commissioner Michael O’Rielly), Brendan Carr (advisor to Commissioner Ajit Pai), and Priscilla Delgado Argeris (advisor to Commissioner Jessica Rosenworcel). A full list of meeting attendees is attached. Wireless industry representatives discussed testing conducted by V-COMM, Inc. that examined potential interference from white space devices and wireless microphones to 600 MHz licensed mobile broadband services.

CTIA supports rules that maximize the repurposing of spectrum for licensed exclusive use in the 600 MHz band and provide for unlicensed use of the 600 MHz guard band and duplex gap, consistent with the Spectrum Act’s requirements. Specifically, the Spectrum Act emphasizes that the “Commission may not permit any use of a guard band that the Commission determines would cause harmful interference to licensed services.”\(^1\) Therefore, in accordance with the Spectrum Act unlicensed operations in the 600 MHz guard band and duplex gap can only be introduced through a regulatory framework that ensures that such operations do not raise interference concerns.

To develop a framework for unlicensed white space devices and wireless microphones that would ensure protection of licensed services from interference, CTIA and its members commissioned V-COMM to test interference from these sources to licensed mobile broadband devices. In the meeting, CTIA members/representatives and V-COMM discussed the results of V-COMM’s testing, a summary of which is attached.

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CTIA is committed to promoting a 600 MHz frequency environment where licensed and unlicensed services can coexist without harmful interference. The wireless industry representatives at the meeting stressed that the Commission can enable this environment through careful consideration of V-COMM’s testing and adoption of rules consistent with CTIA’s and V-COMM’s proposals.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office. Please direct any questions to the undersigned.

Sincerely,

/s/ Krista L. Witanowski

Krista L. Witanowski
AVP, Regulatory Affairs
CTIA-The Wireless Association®
Attachment
March 11, 2015 Meeting Participants

Meeting with Erin McGrath, Legal Advisor, Wireless, Public Safety and International (Office of Commissioner Michael O’Rielly)
Scott Bergmann, Vice President, Regulatory Affairs, CTIA
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.*
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)
Brian Benison, AT&T*
Darryl Degruy, U.S. Cellular*
Leora Hochstein, Verizon
Harry Perlow, Sprint*

Meeting with Brendan Carr, Legal Advisor, Wireless, Public Safety, and International (Office of Commissioner Ajit Pai)
Scott Bergmann, Vice President, Regulatory Affairs, CTIA
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.*
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)
Brian Benison, AT&T*
Darryl Degruy, U.S. Cellular*
Leora Hochstein, Verizon
Chris Mills, Intern, Office of Commissioner Ajit Pai
Harry Perlow, Sprint*
Max Solondz, Verizon*
Neeti Tandon, AT&T*

Meeting with Priscilla Delgado Argeris, Senior Legal Advisor (Office of Commissioner Jessica Rosenworcel)
Scott Bergmann, Vice President, Regulatory Affairs, CTIA
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA
Sean Haynberg, Director of RF Technologies, V-COMM, Inc.*
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (on behalf of CTIA)
Jessica Lyons, Wiley Rein LLP (counsel to CTIA)
Brian Benison, AT&T*
Darryl Degruy, U.S. Cellular*
Leora Hochstein, Verizon
Harry Perlow, Sprint*

* - participated via teleconference.