



January 29, 2013

Via Electronic Filing

Mr. Julius Knapp, Chief, Office of Engineering and Technology
Ms. Ruth Milkman, Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Communication: *Request by Progeny LMS, LLC for Waiver of Certain
Multilateration Location and Monitoring Service Rules*, WT Docket No. 11-49

Dear Mr. Knapp and Ms. Milkman:

Google urges you to reject the request of Progeny LMS, LLC (Progeny), to use the 902-928 MHz band for licensed high-power transmitters that may interfere with millions of lower-powered unlicensed devices already operating in that band. Field testing has demonstrated Progeny's use will disrupt a substantial number of unlicensed devices that consumers and businesses use every day.

Google has long supported making more spectrum under 1 GHz available for unlicensed operations. Indeed, the Commission has recognized the benefits for the public associated with allowing unlicensed communications in lower-frequency bands, where propagation characteristics allow devices to provide service at greater ranges.¹

Demand for unlicensed spectrum continues to increase. Adoption of tablets — which consumers use primarily on unlicensed networks — is skyrocketing. Carriers are relying heavily on Wi-Fi to offload traffic from their licensed networks. New machine-to-machine (M2M) applications that increase efficiency and eliminate waste rely almost exclusively on unlicensed spectrum. At the same time, existing unlicensed allocations — such as the 2.4 GHz — are becoming congested, particularly in major cities and population centers.

Allowing Progeny to operate as it proposes would impair one of the few existing unlicensed designations under 1 GHz and undermine the Commission's progress toward freeing up high-quality spectrum for unlicensed uses. In the face of increasing demand for unlicensed services and increasing congestion in existing allocations, it would represent a step backward in developing an efficient and balanced spectrum policy. Therefore, we urge you to preserve the utility of the 900 MHz band for unlicensed users by rejecting Progeny's request.

¹ *Unlicensed Operation in the TV Broadcast Bands, Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band, Second Report and Order and Memorandum Opinion and Order*, 23 FCC Rcd. 16807 (2008) ¶ 32.

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Pursuant to the Commission's rules, this ex parte is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,



Aparna Sridhar
Telecom Policy Counsel
Google Inc.

cc: Chairman Julius Genachowski (by electronic mail)
Commissioner Robert McDowell (by electronic mail)
Commissioner Mignon Clyburn (by electronic mail)
Commissioner Jessica Rosenworcel (by electronic mail)
Commissioner Ajit Pai (by electronic mail)
Geraldine Matisse (by electronic mail)
John Leibowitz (by electronic mail)