

**Separate Statement Concerning Working Group Reports
For the 1755-1850 MHz Band**

August 29, 2013

The undersigned members of the CSMAC wish to provide a separate statement to the record concerning the Working Group Reports filed in Working Groups 3, 4 and 5. While we believe that the Working Group Reports should move forward as drafted, we also believe that additional clarification should be provided to guide the work of the CSMAC, NTIA and FCC going forward.

First, by voting to approve the report and recommendations to be transmitted to NTIA, we are in no way endorsing the assumptions and methodologies that went into the analysis. Initially, the analysis performed in each of these working groups was both conservative and limited. We believe that additional effort should be initiated that would greatly mitigate the protection zones for Federal operations including, but not limited to, considering other effects such as clutter, more reasonable interference protection limits and considering a more representative LTE system model. We believe that many of the current analysis results do not represent the real-world interference environment between Federal and commercial users.

Additionally, because only limited technical data was shared about Federal systems with the working groups, participants were not able to fully engage in the type of informed discussion of the analysis and underlying assumptions necessary to verify the accuracy of the information. We believe that the process recently initiated to allow the release of more Federal system technical characteristics to parties signing non-disclosure agreements will better inform the commercial parties to understand what can be done to better model an analysis of real-world effects.

In sum, we believe the Working Group process was a beneficial first step towards developing a better understanding of the technical characteristics of Federal and commercial systems. However, we feel that additional efforts are necessary to develop realistic representations of the interference environment between Federal and commercial operations.

Respectfully Submitted,

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