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October 15, 2018

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

**Re: GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum
Between 3.7 and 24 GHz***
**ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band
Ex Parte Communication***

Dear Ms. Dortch:

I am filing this letter on behalf of the Fixed Wireless Communications Coalition (“FWCC”) to report a conference call on October 11, 2018, among the undersigned and Mitchell Lazarus of this firm, co-counsel for the FWCC; George Kizer, consultant to the FWCC; and Bahman Badipour, Michael Ha, Ira Keltz, Julius Knapp, Jamison Prime, and Hugh van Tuyl of the Commission staff.

The topic of the call was the draft Notice of Proposed Rulemaking in the above dockets as pre-released on October 2, 2018. The NPRM considers the deployment of unlicensed RLAN devices in two 6 GHz bands heavily used by the Fixed Service.

The FWCC representatives made the following points:

We welcome the proposal to require Automatic Frequency Control for all indoor and outdoor RLANs, as this is critical to protecting the Fixed Service from harmful interference. Our filings include analyses showing that indoor operation alone cannot adequately protect against interference (NPRM ¶ 72).

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The NPRM does not propose frequencies on which an RLAN can make its initial request to the database for operating frequencies. We do not see how this can be done safely in the 6 GHz bands.

The NPRM proposes to use the ULS database for coordinations (NPRM ¶ 39). But ULS is incomplete and error-prone as to FS receivers; and the Commission charges a \$305 filing fee per call sign for making corrections.¹ More complete and accurate databases exist. We asked the Commission to frame the inquiry about ULS as a question rather than as a proposal, and to consider an amnesty on filing fees for Part 101 ULS corrections.

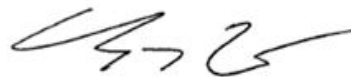
The NPRM proposes not to protect FS receivers against adjacent channel interference, in part on the ground that out-of-band emission (OOBE) limits will protect links on channels adjacent to RLAN operation. (NPRM ¶ 44). Adjacent channel interference arises in part in the FS receiver, where RLAN OOBE limits do not help. We asked the Commission to frame this issue as a question rather than as a proposal.

The discussion of multipath fading (NPRM ¶ 46) asserts that it is generally most severe after midnight. The statement is factually incorrect and is not supported by the authority cited. We suggested it is not essential to the NPRM.

We explained that a two-dimensional exclusion zone with a maximum height limit (NPRM ¶ 51) will not afford adequate interference protection. We asked the Commission to give equal weight to a proposal for a three-dimensional exclusion zone with mechanisms for determining the elevations of individual RLANs.

Please do not hesitate to contact us with any questions.

Respectfully submitted,



Cheng-yi Liu
Mitchell Lazarus
Counsel for the Fixed Wireless
Communications Coalition

cc (via email): FCC participants

¹ The relatively small number of common carrier FS licensees are exempt from the fee when making minor modifications. Private Operational Fixed licensees must pay the fee for both major and minor modifications.