



VIA ELECTRONIC FILING

October 4, 2019

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

Re: Ex Parte Communication
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*

Dear Ms. Dortch:

The Ultra Wide Band Alliance (“UWB Alliance”) understands that the FCC’s Office of Engineering Technology (OET) is working quickly and diligently to determine the best path forward to advise the Commission in the above-referenced 6 GHz proceeding. As such, we wanted to bring to the Commission’s attention the pending publication of an engineering report by iRobot Corporation the OET and Commissioners may find helpful, as it will shed new data on substantial matters of interference that the current record does not contain. **We respectfully request the Commission forebear from issuing any determination on the above referenced proceedings until it has had sufficient time to review the iRobot report findings.** We believe the report will provide critical information needed to supplement – and correct – some of the more controversial studies currently being cited in the present record.

In its recent Ex Parte letter to the FCC¹, iRobot raised serious and credible concerns that the proposed revisions to the 6 GHz band permitting Wi-Fi broadband devices in the U-NII-5 portion of the band could raise significant and deleterious interference issues to others in the band due to sensitivity of their operations. They also urge the Commission delay action until they and others can determine what harms – and options for mitigation of those harms – can be ascertained. We both agree with and support this approach.

UWB Alliance representatives have met with Commission staff to explain that current proposed unlicensed broadband deployment at the requested power levels, bandwidth, and out-of-bandwidth-emissions would effectively render many UWB products, services and applications useless. UWB Alliance has also asked the FCC to consider mitigation solutions that will continue to allow for

¹ See, Letter from Tonya Drake, VP & Assistant General Counsel, iRobot Corporation to Marlene H. Dortch, Secretary, Federal Communications Commission, ET Docket No. 18-295 (filed September 17, 2019).

unlicensed UWB technologies to successfully coexist with incumbent users in the 6 GHz band and provide valuable functionality. We believe that the iRobot report will provide critical statistical data to support our assertion, and shed light on how a coexistence strategy may be developed so that innovation and spectrum management efficiencies can be protected in the 6 GHz band.

We expect the report to be submitted to the Commission within the next few weeks. As such, we respectfully request the Commission forebear from issuing any determination on the above referenced proceedings until it has had sufficient time to review not only the iRobot report findings, but also the findings of others conducting similar analyses.

We look forward to working with the Commission as it seeks to modify its initial proposal to create a 6 GHz spectrum policy and rules that allows all innovators to participate in the UWB ecosystem without harmful interference. Please feel free to contact me with any questions.

Respectfully Submitted,

Timothy Harrington
Executive Director
UWB Alliance