

October 15, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**EX PARTE FILING OF ENCINA COMMUNICATIONS CORPORATION
RE NOTICE OF PROPOSED RULE MAKING
ET DOCKET 18-295 UNLICENSED USE OF THE 6 GHz BAND AND
EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM
GN DOCKET NUMBER 17-183**

Dear Ms. Dortch:

On October 15, 2018, Michael Mulcay of Encina Communications Corp. (ECC) had a telephone conversation with Rachael Bender, Wireless Advisor to Chairman Ajit Pai.

We discussed that by using the proven protocols and procedures of Rule 101.103 to create 6 GHz Unlicensed “Safe Zones” within which unlicensed devices (such as access points, notepads, laptops and 5G smart phones, etc.) can be safely operated indoors and outdoors.

Only outside of these Safe Zones would unlicensed devices need interference mitigating mechanisms such as AFC.

Each zone has an area of approximately 120 square miles. (This approach builds on the ECC 18-295 filing of Oct. 5, 2018.)

We discussed that because the Safe Zones are prior coordinated and subject to a peer review to show that there will be no interference into existing stations before being deployed, we therefore expect industry support during the NPRM Comment and Reply Comment periods.

With industry support, we believe the Commission could issue a Report and Order in early 2019 to permit the deployment of 6 GHz unlicensed Safe Zones, while continuing to debate how best to protect existing fixed stations from unlicensed devices outside of the Safe Zones (with mechanisms such as AFC).

Therefore we believe it is in the public interest for the Commission to include this Rule 101.103 “Safe Zone” approach in the NPRM to give industry additional options for a swift and safe solution.

Respectfully submitted.

Michael Mulcay, Chairman & CTO
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Courtesy copies to:

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