



February 1, 2019

Ex Parte

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

Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Ms. Dortch:

Engine is a non-profit technology policy, research, and advocacy organization that bridges the gap between policymakers and startups. Engine works with government and a community of high-technology, growth-oriented startups across the nation to push for policies that support the development of technology entrepreneurship. To that end, Engine strongly supports creating more opportunities for unlicensed airwaves, which fuel Wi-Fi networks and so much of the innovation that has made the U.S. startup ecosystem the envy of the world. Engine requests that the FCC move on to next steps to open up spectrum in the 5.9 GHz band for unlicensed use.

The 5.9 GHz band is uniquely suited to boosting the availability of unlicensed airwaves for Wi-Fi networks. The band is adjacent to the U-NII-3 band, which already supports many of the nation's Wi-Fi networks, and is adjacent to the 6 GHz band, which the FCC has taken steps towards making available for unlicensed use. Opening up the 5.9 GHz band for unlicensed use could make available enough spectrum for several of the contiguous 160-megahertz channels needed to distribute Gigabit capacity over Wi-Fi.¹ Another benefit of its proximity to the existing U-NII-3 band is the relative ease with which Internet users could start accessing those Wi-Fi

¹ See Comments of NCTA — The Internet & Television Association, ET Docket 13-49, at 3 (filed October 16, 2018) (“While the latest Wi-Fi standards (IEEE 802.11ac, and next-generation 802.11ax), which operate in the 5 GHz band, can deliver Gigabit speeds, these technologies require wide-bandwidth, 160-megahertz channels to do so. Unfortunately, today, Americans have no access to a contiguous 160-megahertz channel unconstrained by burdensome Dynamic Frequency Selection limitations.”).

networks using equipment that is already on the market. That means the U.S. could see better, faster Internet access over Wi-Fi networks sooner.²

Better connections and more access to the Internet is a crucial policy issue for startups. With a connection to the Internet, a small startup anywhere in the U.S. can reach users across the world. The growth made possible by the Internet is what makes the U.S. startup ecosystem such an engine of economic growth. Expanding and improving access to the Internet means more entrepreneurs will be able to innovate and grow their businesses.

If exclusive access to spectrum in the 5.9 GHz band is no longer necessary for Dedicated Short Range Communications technology, as the testing done by the Commission and others show, the FCC has a chance to free up that valuable spectrum for unlicensed use and the innovation made by possible by unlicensed airwaves. Engine appreciates the Commission's work to make unlicensed spectrum available more broadly and encourages the FCC to issue a Further Notice of Proposed Rulemaking to open an appropriate part of the 5.9 GHz band for unlicensed use.

Respectfully submitted,

Evan Engstrom
Executive Director
Engine

² See Comments of the Wi-Fi Alliance, ET Docket 13-49, at 3 (filed July 7, 2016) (“[T]he same equipment will be able to take advantage of additional capacity and offer higher speeds using wider bandwidths — assisting in meeting the challenges of rapidly growing demand for higher bandwidth data streams”).