

VIA ECFS

October 21, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

Encina Communications Corporation (ECC) responds to the ex parte filing of October 3, 2019, by representatives from Apple Inc., Broadcom Inc., et al (RLAN Proponents).

**I. DISCUSSION**

Once again, RLAN Proponents completely ignored the cases where randomly deployed unlicensed devices are located near Fixed Service (FS) stations causing interference levels greater than the FS receivers allowed co-channel interference ratio which would cause a total link failure, which would continue until the source or sources of the interference are identified and the appropriate action taken to eliminate it. They also ignored cases where small (5, 10 or 20 dB) fades of the wanted signal will cause total link failure and make it very difficult to identify and eliminate the source or sources of the interference.

Once again, RLAN Proponents merely present cases where unlicensed devices will not cause harmful interference or where the interference will only exist during short periods of time for deep fades (30 or 40 dB).

**II. CONCLUSION**

Through the use of standard industry-accepted path-loss equations<sup>1</sup>, it is easily shown that random deployment of unlicensed devices without AFC will cause harmful and even catastrophic interference to existing and future FS stations -- disrupting commerce, impacting critical communications infrastructure, and endangering public safety.

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<sup>1</sup> See ECC's NPRM 18-295 filing of October 1, 2019.

Therefore, a Report and Order must contain AFC for both indoor and outdoor unlicensed devices.

Respectfully submitted.

Michael Mulcay, Chairman & CTO

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