

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

In the Matter of)	
)	
Unlicensed Use of the 6 GHz Band)	ET Docket No. 18-295
)	
Expanding Flexible Use in Mid-Band)	GN Docket No. 17-183
Spectrum Between 3.7 and 24 GHz)	
)	

COMMENTS OF HP INC.

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COMMENTS OF HP INC.

HP is a global leader in the personal systems and printing industries, with a combined total addressable market in excess of \$500B. Our personal systems business seeks to delight consumer and commercial users with the best user experience to help them get the most out of technology. Our printing business is a global leader in home, office and large format printing, reinventing what is possible for our customers every day. Our 3D Printing business leverages 30 years of technology and expertise as it seeks to disrupt the multitrillion dollar global manufacturing industry. The majority of our products include and depend on Wi-Fi connectivity.

HP Inc. submits these comments in response to the Notice of Proposed Rulemaking in the above-referenced proceedings in which the Commission seeks input on unlicensed use of the 5.925-7.125 GHz ("6 GHz") band.

HP Inc. would like to thank the Commission for initiating the "Unlicensed Use of the 6 GHz Band" proceeding. HP Inc. fully supports the Commission's stated objective to promote new opportunities for unlicensed use in portions of the 1200 megahertz of

spectrum in the 5.925-7.125 GHz (6 GHz) band while ensuring that licensed services operating in the band continue to thrive.^{1/}

HP Inc. plans to offer a number of new and innovative electronic products, based on the IEEE 802.11ac/ax protocols. The performance and functionality of these products would benefit significantly from wider channels (i.e., 80 MHz/160 MHz) that can be implemented in the contiguous spectrum blocks available in the 6 GHz band.

In this regard, HP Inc. would like to emphasize the importance of defining uniform rules that apply to unlicensed spectrum across the U-NII-5 (5.925-6.425 GHz), U-NII-6 (6.425-6.525 GHz), U-NII-7 (6.525-6.875 GHz) and U-NII-8 (6.875-7.125 GHz) sub-bands.^{2/} HP Inc. is concerned with the Commission's proposal to curtail *all* of the unlicensed operations in U-NII-5 and U-NII-7 sub-bands only on frequencies determined by an automated frequency coordination (AFC) system.^{3/} HP Inc. is of the view that there is no need to burden the low-power, indoor-only U-NII operations with the AFC constraint because such operations will have minimal potential to cause interference. Moreover,

^{1/} *In the Matter of Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295, FCC 18-147 (rel. Oct. 24, 2018) (“*NPRM*”) at ¶ 1.

^{2/} *NPRM* at ¶ 21.

^{3/} *NPRM* at ¶ 21.

such constraint will result in increased product costs and delay unlicensed access to this much needed spectrum.

HP Inc. urges the Commission to allow low-power indoor-only unlicensed operations in the 6 GHz band without the AFC requirements.

Respectfully submitted,

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