

**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 of the 3.7 and 4.2	)	GN Docket No. 17-183
GHz Band	)	
	)	

**COMMENTS OF THE COMPUTING TECHNOLOGY INDUSTRY ASSOCIATION  
(COMPTIA)**

The Computing Technology Industry Association (CompTIA) is a leading voice and advocate for the \$1.5 trillion U.S. information technology ecosystem and the 11.5 million technology and business professionals who design, implement, manage, market, and safeguard the technology that powers the U.S. economy. Through education, training, certifications, advocacy, philanthropy, and market research, CompTIA is the hub for advancing the tech industry and its workforce.

CompTIA’s membership includes not only ISPs providing wireless broadband service, but also many companies whose products and services rely on their own and their customers’ access to wireless broadband. CompTIA submitted comments in 2017 encouraging the FCC to further explore the feasibility of unlicensed use of the 5.925-7.125 GHz (6 GHz) band,<sup>1</sup> and we would like to thank the Commission for moving this proceeding forward.

The 6 GHz band, and mid-band spectrum in general, is a critical component of next generation wireless services. As the Commission notes in its NPRM, making this band available for unlicensed use “could promote new technology and services that will advance the Commission’s efforts to make broadband connectivity available to all Americans, especially those in rural and underserved areas.”<sup>2</sup> According to the FCC’s most recent Broadband Deployment Report, over 24 million Americans, the vast majority of which reside in rural areas, still do not have access to terrestrial broadband.<sup>3</sup> Access to 6 GHz spectrum could help companies providing high-speed wireless broadband expand their networks and increase capacity in rural areas, particularly in places where it is simply too costly to run fiber to each and every home.

Additionally the 6 GHz band will help address the ever-growing need for Wi-Fi for hotspots, mobile traffic offload, home usage and IOT devices. More devices are connecting to the internet

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<sup>1</sup> CompTIA Comments, GN Docket No. 17-183 (2017).

<sup>2</sup> *In re* Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295, Notice of Proposed Rulemaking, para. 1 (2018) (“6 GHz NPRM”).

<sup>3</sup> *In re* Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, GN Docket No. 17-199, 2018 Broadband Deployment Report, para. 50 (2018).

every day and the current Wi-Fi bands in 2.4 GHz and 5 GHz won't be nearly robust enough to support the projected traffic.<sup>4</sup>

The 6 GHz band also provides a unique opportunity for wider bandwidth channels because of its proximity to the 5 GHz unlicensed bands. Such channels are critical to providing high-speed wireless coverage in densely populated areas.

CompTIA supports the Commission's proposal to expand the use of Part 15 unlicensed devices in the 6 GHz band but offers a few additional suggestions to increase protection for incumbent licensees already operating in the bands. We support the Commission's proposal to permit standard-power access points managed by an automated frequency coordination (AFC) system in the U-NII-5 and U-NII-7 bands as well as the proposal to restrict the U-NII-6 and U-NII-8 bands to low power, indoor-only use. We also support low power, indoor use throughout the entire 6 GHz band.

An additional 850 MHz of spectrum for unlicensed use in the U-NII-5 and U-NII-7 bands in particular will provide an incredible amount of new mid-band spectrum. We have already seen meaningful and tangible benefits from unlicensed use in the U-NII-1 and U-NII-3 bands. Opening up the U-NII-5 and 7 bands holds the promise of allowing for similar use with the possibility of increased speed and capacity from much wider channels. An AFC system in these bands should provide adequate interference protection for incumbent services as well.

While the U-NII-6 and U-NII-8 bands present different, more complex interference concerns with incumbents, CompTIA applauds the Commission's efforts to try to make the most of the 350 MHz in these bands. In addition to the restrictions on power levels and indoor-only use, expanding use of the AFC system to manage standard-power and/or outdoor unlicensed devices in the U-NII-6 and U-NII-8 bands to protect incumbent fixed services in those bands could prove useful. The AFC system will assist in identifying the location of fixed services users in these bands to help avoid harmful interference to these incumbent services. In addition to preventing harmful interference to incumbents, expanding AFC management to these bands could also ultimately allow for some outdoor use of these bands in areas where Broadcast Auxiliary Service is not used. If expanding AFC management to standard-power and/or outdoor unlicensed devices in the U-NII-6 and U-NII-8 bands will pose no additional cost or operational burden, it merits Commission consideration.

Allowing unlicensed devices to operate in the 6 GHz band is crucial to the future of next generation wireless service in America. This band can be used to expand coverage and increase capacity in rural areas while simultaneously providing high-speed wireless broadband in dense urban areas. The Commission must capitalize on this unique opportunity to make more than 1 GHz of spectrum available for unlicensed use in a single proceeding. Opening up the 6 GHz band is, quite simply, a key component in winning the global race to 5G.

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<sup>4</sup> See e.g. Ericsson, *Future Mobile Data and Traffic Growth*, <https://www.ericsson.com/en/mobility-report/future-mobile-data-usage-and-traffic-growth> (last visited Feb. 15, 2019).