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

**Comments of Wireless Applications Corp.
Re ET Docket No. 18-295 Unlicensed Use of the 6 GHz band and
Expanding Flexible Use in Mid-Band Spectrum GN Docket No. 17-183.**

Dear Ms. Dortch:

Wireless Applications Corp. (WAC) is providing these comments in support of Encina Communications Corporation's filing of October 1, 2019 regarding ET-Docket 18-295.

Established in 1999, WAC is an award-winning telecom consulting company and one of the major frequency coordinators in the US providing: Frequency Analysis/Interference Analysis, Frequency Coordination, FCC Licensing, Frequency Protection, Tower Searching and GIS Analysis/Mapping services to wireless companies of varying sizes, including both national and regional carriers. WAC is a member and Gold Level Sponsor of the National Spectrum Managers Association (NSMA).

With over twenty years of experience in the design, frequency coordination and licensing of new paths which have been integrated into existing licensed systems, we agree with Encina Communications Corporation that random indoor and outdoor deployment of unlicensed devices in licensed bands without Safe Area Coordination (SAC) before Automatic Frequency Control (AFC) of deployed unlicensed devices will cause harmful co-channel interference. This is interference to existing and future fixed services stations even when there is no fading on the licensed station's paths.

We also note that proponents of the random deployment of unlicensed indoor devices without AFC have not disputed the fact that when deployed in buildings close to a victim receiver (existing or future), they will almost certainly cause catastrophic interference, even with an unfaded licensed path.

Therefore, it is essential that SAC and then low-cost and simple AFC be used in the deployment of any unlicensed devices in the 6 GHz band.

Respectfully submitted,



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cc:

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