

February 25, 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*, ET Docket No. 13-49

Dear Ms. Dortch:

On December 21, 2018 I met with Giulia McHenry, Chief of the Bureau of Economics, and Aleks Yankelevich and Paul LaFontaine, of the Bureau of Economics. I discussed a new report from RAND titled "The Potential Economic Value of Unlicensed Spectrum in the 5.9 GHz Frequency Band: Insights for Future Spectrum Allocation Policy." A methodological question was raised that I responded to today in an email to Paul LaFontaine. The text read as follows:

"Dear Mr. LaFontaine,

I wanted to follow-up regarding a question you raised at my December 21, 2018 briefing of "The Potential Economic Value of Unlicensed Spectrum in the 5.9 GHz Frequency Band: Insights for Future Spectrum Allocation Policy." Regarding Approach 1 for estimating the potential contribution to GDP, you asked about the conversion of channel size (e.g., 160 MHz) into data rates, to compute differentials for analysis. We used the Modulation and Coding Scheme (MCS) Index (<http://mcsindex.com/>), based on IEEE standards, to estimate data rates for a given channel bandwidth under a set of assumptions about the technical specifications of devices. Those assumptions, along with a more detailed explanation of this estimation, can be found on p20-22 and in footnote 19 of the report. Further discussion of the MCS Index is included in Approach 2, p25-32.

I hope this is helpful and I am happy to answer any additional questions."

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced docket. If you require any additional information, please contact the undersigned.

Thank you,

Diana Gehlhaus Carew

Diana Gehlhaus Carew
Doctoral Fellow
RAND Corporation