

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

**REPLY COMMENTS
OF
P&R COMMUNICATIONS SERVICE, INC.**

P & R Communications Service, Inc. (“P&R”) provides comprehensive wireless solutions to business and public safety entities throughout Western Ohio with offices in Dayton, Sidney and Toledo. We have grown substantially from our founding days to employ over 50 professionals engaged in administration, wireless system and device sales, system maintenance, installation, design and engineering, and project management. P&R provides a diversified array of wireless solutions and applications including two-way radios, commercial carrier solutions, fleet management/vehicle tracking products, paging, and siren and light solutions for both commercial and Public Safety customers. In addition, we have expanded our wireless reach to include over 10 tower sites that we built and maintain and on which we lease space.

As veterans in wireless communications, we are well aware of America’s voracious appetite for Wi-Fi and of the expected growth in IoT devices, both for consumer and industrial applications. We understand that the FCC is searching for spectrum that could be made available for these unlicensed uses and support that effort. However, like so many other parties to this proceeding, we cannot support what we believe is a rush to judgment that this unlicensed use will be compatible with and provide appropriate protection for microwave systems, particularly in what the FCC has agreed is a heavily encumbered U-NII-5 band (5.925-6.425 MHz), as well as the U-NII-7 band (6.525-6.875 MHz).

The FCC has described the facilities in these bands as “highly reliable point-to-point microwave links that support a variety of critical services such as public safety...coordination of railroad train movements, control of natural gas and oil pipelines, management of electric grids, long-distance telephone service, and backhaul for commercial wireless providers....”¹ The principals of P&R and its employees enjoy using wireless devices for streaming video and gaming as much as the rest of the public. But we are not willing to risk interference with the vital

¹ NPRM at ¶ 9.

communications carried on 6 GHz links just to enjoy instantaneous, always available Wi-Fi service and we don't think most Americans would be if they understood that risk.

P&R's 6 GHz licenses provide network connectivity for our wide-area trunking system that provides voice and data services for over 3000 subscribers. Those subscribers are not consumers that use wireless service for entertainment and other non-essential purposes. They are school systems that rely on it for school bus communications and location data. They are private ambulance services that transport patients in need of life-saving treatment to and from hospitals, nursing homes, and residences. They are construction contractors such as concrete suppliers that rely on the network for communications involving worker safety and productivity. In addition to our commercial trunking backbone, we have 6 GHz links in our Vador net backbone that is used by several broadcast radio stations to connect their studios to their transmitter sites. P&R also uses these links for internal communications among our various locations in Ohio. These systems are critical in our ability to dispatch our service assets quickly when needed to repair the multitude of Public Safety networks that we service and maintain. Our ability to get service people on site promptly in response to a Public Safety system outage is dependent on the reliability of our network, including its 6 GHz links.

It may be that an automated frequency coordination (AFC) system(s), the concept on which the FCC's non-interfering sharing proposal is based, will prove effective. It is possible that the exclusion zones around incumbent microwave systems will be defined in such a way that microwave links will continue to operate effectively on an interference-free basis, and thereby able to continue meeting critical public service and safety requirements. Until the AFC approach has demonstrated that it will provide the protections promised, a capability that has not yet been proven for use in TV White Space or the 3.5 GHz band, P&R urges the Commission to proceed with deliberate speed. Further review and testing of this concept will cause no irreparable injury to the public, while premature unlicensed access to the 6 GHz band could prove catastrophic.

P&R appreciates the Commission considering these comments.

/s/ David C. Reeves
President
P & R Communications Service, Inc.

March 18, 2019