

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 Spectrum)	GN Docket No. 17-183
Between 3.7 and 24 GHz)	

Reply Comments of Sony Electronics Inc.

Sony Electronics Inc. (“Sony”)¹ respectfully submits the following reply comments in response to the initial comments filed on the Notice of Proposed Rulemaking in the above-referenced proceeding.²

First, several commenters have suggested that the Commission should assign responsibility for resolving interference complaints to automated frequency coordination (“AFC”) system operators.³ One commenter, Southern Company Services, Inc., proposed that an AFC system operator should be held responsible “if an interfering device that should have been under its control is found at an unauthorized location or with operating parameters that vary from the parameters dictated by the AFC operator.”⁴ Sony opposes these proposals. An AFC system will have the ability to assess whether the information provided by access points complies with the Commission’s rules and conforms to relevant standards, and

¹ Sony Electronics is the U.S.-based sales, marketing, research, and development subsidiary of Sony Corporation, a leading manufacturer of audio, video, game, communications, and information technology products for the consumer and professional markets. Sony entities design, manufacture, and sell mobile products throughout the world, and have conducted extensive research and testing of next-generation wireless services.

² *Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295, Notice of Proposed Rulemaking, 33 FCC Rcd 10496 (2018) (“NPRM”).

³ *E.g.*, Comments of the National Spectrum Management Association at 14 (“Unexpected circumstances will occur causing harmful interference. Someone must be held responsible for resolving these issues. This suggests a limited number of AFC operators using a shared (or synchronized) database.”); Comments of the Utilities Technology Council *et al.* at 16-17 (“[T]he Commission should clarify whether the AFC or the unlicensed operator is ultimately responsible for correcting the interference that is caused, as well as assuming liability for the consequences of the interference.”).

⁴ Comments of Southern Company Services, Inc. at 13.

will have the ability to authorize access points based on this information. It will be impossible, however, for an AFC system to verify the parameters that it receives, or to “know” whether the access points under its management are actually operating on authorized frequencies and at authorized power levels.

As a workable alternative, Sony supports the recommendation from the Fixed Wireless Communications Coalition that the Commission’s rules should “include certification requirements to make certain that every RLAN device will always operate under strict AFC control.”⁵ Such requirements would place responsibility for compliance with AFC system authorizations and remediation of unexpected interference on the parties that will be most able to exercise the necessary control – the manufacturers, owners, and/or operators of access points.

Finally, Sony urges the Commission to focus on establishing incumbent protection requirements, while recognizing the important distinction between the need for these protections and the notion of coexistence among prospective unlicensed wireless technologies. As suggested by several commenters,⁶ the Commission should adhere to its long-held principles of technology neutrality and avoid prescribing any particular coexistence methods or solutions for unlicensed devices. These decisions should be left to accredited standards bodies and to market forces.

Respectfully Submitted,

/s/

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⁵ Comments of the Fixed Wireless Communications Coalition at 31.

⁶ E.g., Comments of CTIA at 12 (“Industry-based standards bodies have successfully adopted standards to ensure that varying technologies can coexist. The Commission has relied on those bodies – not prescriptive regulations – to drive innovative uses of spectrum and new technologies.”); Comments of Verizon at 22 (“As long as new entrants comply with FCC rules and implement techniques to coexist with other unlicensed users, the Commission should maintain its longstanding policy of technological neutrality with respect to unlicensed devices.”).