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VIA ELECTRONIC FILING

April 5, 2018

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 201154

Re: **Ex Parte Notification**

GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*

Dear Ms. Dortch:

On April 4, 2018, Russell Fox of Mintz Levin and I met with the following members of the staff of the Office of Engineering and Technology regarding the above-referenced proceeding:

Julius Knapp	Karen Rackley
Aspasia Paroutsas	Bahman Badipour
Ron Repasi	Nicholas Oros
Michael Ha	

We discussed how limited availability of unlicensed mid-band spectrum undermines the potential of Wi-Fi technology to deliver ubiquitous broadband connectivity and how allowing access to the 5.925-7.125 GHz band (the “6 GHz band”) for unlicensed operations would address this problem. In particular, we noted that the next generation of Wi-Fi, based on IEEE standard 802.11ax, is optimized to support high data throughput applications in wider channels (*i.e.*, 80 megahertz and 160 megahertz), and therefore requires access to contiguous spectrum segments. We further emphasized that 6 GHz band spectrum is ideally suited for rapid deployment of Wi-Fi technologies because it is adjacent to spectrum in the 5 GHz band that is designated for unlicensed use.

Noting that technologies using spectrum allocated for unlicensed operations are required to protect existing and future licensed users, we discussed potential technical, operational and regulatory solutions that would mitigate possible interference to those users. We pointed out that Wi-Fi has a proven history of protecting incumbent operations and expressed that existing and/or additional techniques can be extended to the 6 GHz band to achieve that result. Finally, we asked the Commission to advance, in a timely manner, to the next stage of this proceeding with respect to the 6 GHz band in order to address the urgent need for additional access to spectrum

designated for unlicensed use. We offered that the most effective way to develop the record on this important issue is to initiate a Notice of Proposed Rulemaking.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced docket and a copy is being provided to each member of the Commission's staff with whom we met. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Alex Roytblat

WI-FI ALLIANCE

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cc: (each electronically)

Julius Knapp

Aspasia Paroutsas

Ron Repasi

Michael Ha

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