

12 April 2018

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

Re: Letter Filing
3.5 GHz SAS and ESC Applications, GN Docket No. 15-319.

Dear Ms. Dortch,

As you know, members of the Wireless Innovation Forum Spectrum Sharing Committee (hereafter “the WInnForum SSC”) are developing a software test harness in support of the baseline standards that were recently announced¹. In addition, the FCC has enlisted NTIA ITS to do SAS certification testing using this software test harness. Consistent with the Commission’s SAS Testing workshop on Sept 21, 2017 and the testing agreements between ITS and SAS administrators, the scope of ITS testing is specifically limited to Part 96 compliance tests. With that as background, the WInnForum SSC offers the following comments:

1. ITS plans to conduct functional test of a SAS using a very large number of CBSDs. ITS asserts that 45,000 simulated CBSD locations, representing a “mature deployment” phase for the CBRS, are necessary to verify certain aspects of the federal incumbent protection algorithm as developed by the WInnForum and implemented in the SAS.²
2. The consensus of the WInnForum SSC Steering Group is that functional compliance of the SAS can be tested with a much smaller number of CBSDs that are specifically configured to emulate the scenario(s) of concern to ITS.
3. Part 96 does not specify commercial performance requirements for the SAS such as scalability. As a result, testing of a SAS’s commercial performance capabilities, such as with quantities of CBSDs representing a “mature commercial deployment”, is out of scope.

Based on these comments, the members of the WInnForum SSC Steering Group request that the WTB/OET direct ITS to reconsider work related to test scenarios using the smaller numbers of CBSDs necessary to test calculation methods and continue to pursue an open and collaborative discussion with the SSC to resolve these issues.

Pursuant to the Commission’s rules, this letter is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

¹ <https://www.businesswire.com/news/home/20180130006409/en/Wireless-Innovation-Forum-Completes-Foundational-Standards-Enabling>

² Citing NTIA’s published work on exclusion zone simulation and analysis (see NTIA Report 15-517 3.5 GHz Exclusion Zone Analyses and Methodology), and applying this to a DPA neighborhood, ITS has asserted that certain atypical aspects of CBSD move list generation for the DPA Protection Procedure (see Spectrum Sharing Committee WG1, CBRS Operational and Functional Requirements, WINNF-TS-0112-V1.4.1, R2-SGN-24) emerge only with a very large number of CBSDs under test.

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Respectfully submitted,

By /s/:

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