

VIA ECFS

April 24, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**EX PARTE FILING OF ENCINA COMMUNICATIONS CORPORATION
RE NOTICE OF PROPOSED RULE MAKING
ET DOCKET 18-295 UNLICENSED USE OF THE 6 GHZ BAND AND
EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM
GN DOCKET NUMBER 17-183**

Dear Ms. Dortch:

On April 24, 2019, I had a telephone conversation with Umair Javed, of Commissioner Rosenworcel's office.

We discussed that the two imperatives of the proceeding are:

- Expediently Proceed to a First Report and Order
- Protect Existing Licensees

Also, that both can be achieved by using industry proven procedures¹ to Prior Coordinate "Safe Areas" around urban, suburban, rural communities, therefore allowing the Commission to proceed expeditiously to a First Report and Order, which would provide unlicensed services to over 95% of the US population.

We also discussed that other² filers see Automatic Frequency Coordination as a gradually implemented solution with 9 steps over several years -- and even then their filing mentions "*... the inevitable instance when an unlicensed RLAN device causes harmful interference with a licensed FS station...*".³ This fails to meet either of the imperatives, neither proceeding expeditiously nor providing 100% protection for existing licensees.

¹ TIA TSB10-F

² Ex parte filing of AT&T, Comsearch and Verizon, April 22, 2019

³ Ex parte filing of AT&T, Comsearch and Verizon, April 22, 2019, page 3, Section 9.

Respectfully submitted.

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