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May 2, 2019

**Via Electronic Filing**

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

**Re: GN Docket No. 17-183**  
**ET Docket No. 18-295**  
**Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On April 30, 2019, James Crandall of the American Petroleum Institute (“API”), several members of the API Telecommunications Subcommittee, and the undersigned, met with staff from the Commission’s Office of Engineering and Technology to discuss the Notice of Proposed Rulemaking in the above-referenced dockets proposing to allow unlicensed devices to operate in the 6 GHz band.<sup>1</sup>

During the meeting, API described the importance of 6 GHz point-to-point microwave links to critical infrastructure operations. Consistent with its comments in this proceeding, API emphasized that any plan to introduce unlicensed devices to the 6 GHz band must ensure point-to-point operations are protected from interference. Automated frequency coordination requirements should be placed only on unlicensed devices, not on Part 101 licensees. In addition, any use of automated frequency coordination must take into account how to prevent interference in cases of unlicensed device malfunction including through security and backup measures.

Pursuant to Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically for inclusion in the public record of this proceeding. Please contact the undersigned if you have any questions.

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<sup>1</sup> See Unlicensed Use of the 6 GHz Band; Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz; *Notice of Proposed Rulemaking*, ET Docket No. 18-295, GN Docket No. 17-183 (Rel. Oct. 24, 2018).

## KELLER AND HECKMAN LLP

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We look forward to continuing to work with the Commission on this matter.

Sincerely,

/s/

Greg Kunkle

CC: Paul Murray  
Jamison Prime  
Hugh Van Tuyl  
Karen Rackley  
Bahman Badipour  
Syed Hasan