

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Unlicensed Use of the 6 GHz Band	)	ET Docket No. 18-295
	)	
Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz	)	GN Docket No. 17-183
	)	

**COMMENTS**

The City and County of Denver, Colorado, the City of Kansas City, Missouri, Ozaukee County, Wisconsin, San Bernardino County, California, Orange County, California and the Government Wireless Technology & Communications Association (“GWTCA”) (jointly, the “Joint Commenters”), through counsel and pursuant to Section 1.429(f) of the Commission’s Rules, 47 C.F.R. §1.429(f), hereby submits its Comments in response to the Petition for Reconsideration submitted by the Association of Public Safety Communications Officials-International, Inc. (“APCO”) in the above-captioned matter.<sup>1</sup>

**BACKGROUND**

As discussed in its initial Comments, the Joint Commenters have microwave interests in the 6 GHz band, and thus are extremely concerned about the potential of interference to these operations, which are crucial to public safety. As the Commission has discovered in the 800 MHz band and the 470-512 MHz “T-Band”, the discovery and mitigation of interference to public safety

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<sup>1</sup> Orange County, California was not an initial Commenter, but herein joins the coalition because of its concern for interference to the County’s 6 GHz operations.



WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

CITY OF KANSAS CITY, MISSOURI  
CITY AND COUNTY OF  
DENVER, COLORADO  
ORANGE COUNTY, CALIFORNIA  
OZAUKEE COUNTY, WISCONSIN  
SAN BERNARDINO COUNTY, CALIFORNIA  
THE REGIONAL WIRELESS COALITION  
GOVERNMENT WIRELESS TECHNOLOGY  
AND COMMUNICATIONS ASSOCIATION

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