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June 19, 2018

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

Re: ***Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz***
GN Docket No. 17-183

Dear Ms. Dortch:

The Wireless Internet Service Providers Association (“WISPA”) enjoys a unique perspective with respect to spectrum sharing in the 6 GHz band. On one hand, WISPA members have deployed thousands of licensed links for backhaul and Internet connectivity that must not be made subject to new sources of harmful interference if new uses are introduced into the band. On the other hand, WISPA members would benefit from access to additional spectrum, for both outdoor use to expand networks and to increase capacity, and for indoor use for routers and other WiFi-enabled devices.

WISPA appreciates the level of engagement and concern for the rights of incumbent 6 GHz licensees. Overall, WISPA agrees that the framework proposed in the June 12, 2018 ex parte letter filed by technology companies is reasonable and represents an excellent starting point for a notice of proposed rulemaking.¹ In particular, the framework recognizes that indoor devices and outdoor devices should be treated differently given their potential impact on existing operations. WISPA also agrees that both ex ante interference protection measures and a periodic database check are essential parts of a comprehensive regulatory framework. Applying these functional requirements will pave the way for shared use of a new unlicensed band that could bring significant benefits to consumers.

WISPA looks forward to participating further in this proceeding and, in particular, in evaluating more detailed technical information.

Respectfully submitted,

/s/ Claude Aiken
Claude Aiken
President and CEO

¹ See Letter to Marlene H. Dortch, FCC Secretary, from Apple Inc., *et al.*, GN Docket No. 17-183 (filed June 12, 2018).