



July 1, 2016

VIA ELECTRONIC FILING

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

Re: **Written *Ex Parte* Communication**

*Office of Engineering and Technology and Wireless Telecommunications
Bureau Seek Information on Current Trends in LTE-U and LAA Technology,
ET Docket No. 15-105*

Dear Ms. Dortch:

On June 28, 2016, Kevin Robinson, Vice President of Marketing of Wi-Fi Alliance, and I spoke by telephone with Edward Smith, legal advisor to Chairman Wheeler.^{1/} On June 29, the two of us, along with Alexander Roytblat, Senior Director of Worldwide Regulatory Affairs of Wi-Fi Alliance spoke by telephone with Julius Knapp, Ira Keltz, and Walter Johnston of the Office of Engineering and Technology. Each call related to the status of efforts to develop a test plan to ensure fair coexistence between Wi-Fi devices and equipment operating on unlicensed spectrum using Long Term Evolution (“LTE”) technology (“LTE-U” equipment). The points discussed below were covered during one or both of the calls.

We noted that finalizing the important details of the plan in order to ensure the best outcome for users is a technically difficult process that continues to progress as LTE-U and Wi-Fi stakeholders collaborate towards a solution. Current engineering efforts are focused on demonstrating the soundness of the test approach, not on characterizing whether particular products can fairly coexist. The test plan currently includes an evaluation of devices’ ability to operate in the presence of other devices operating at each of three different signal levels. There is agreement among stakeholders on two of the three signal

^{1/} Wi-Fi Alliance recognizes that, pursuant to Section 1.1206 of the Commission’s rules, this *ex parte* filing is one day late with respect to the first of the two meetings described. Wi-Fi Alliance therefore asks the Commission to waive the applicable rule to the extent necessary. The slight delay was inadvertent and occurred while Edgar Figueroa was traveling internationally. The purpose of the rule is to ensure that parties have timely notice of *ex parte* communications. The Commission is not expected to act in this proceeding shortly. Therefore, waiver of the rule will not prejudice any of the parties to the proceeding and granting the waiver would be in the public interest.

levels, but we only have a placeholder for the third level. There is no consensus yet on what the third level will be, and since the most recent workshop in June, industry participants have been working to resolve the appropriate signal level. Stakeholders are working with Wi-Fi Alliance to establish consensus. A number of other work packages remain, and three of those still need industry volunteers. The additional work packages are foundational and completing them will help speed validation of test cases.

While there remains work to be done, the outlook is positive. Since the April workshop, several companies have been working on specific contributions and work items intended to help finalize the test plan. Notably, Qualcomm and Samsung, two members of the LTE-U community, have made meaningful contributions and closed a number of previously open work packages. Based on the work remaining, we estimate release of a final test plan in late September. At that point, the test plan will have been validated and finalized; at least one neutral test laboratory will be qualified to execute the testing; and LTE-U equipment vendors will be able to initiate equipment testing. Wi-Fi Alliance continues to work with organizations that have relationships with the licensed wireless community and an interest in testing products using the Wi-Fi Alliance-developed test plan. Following the test plan's release, Wi-Fi Alliance intends to remain available to maintain the test plan, and we do not at this point intend to be involved with the testing's execution. Wi-Fi Alliance will encourage product vendors and service providers to test their own LTE-U products using the Wi-Fi Alliance test plan to determine the extent to which those LTE-U products fairly coexist with Wi-Fi.

Wi-Fi Alliance remains confident that industry can deliver a solution to ensure fair coexistence between LTE-U and Wi-Fi products. Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and copies provided to each member of the Commission's staff with whom we spoke. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



WI-FI ALLIANCE

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cc: Edward Smith
Julius Knapp
Ira Keltz
Walter Johnston