

July 19, 2019

Ex Parte

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

Re: *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

Dear Ms. Dortch:

On July 17, 2019, representatives from Apple Inc., Cisco Systems, Inc., Facebook, Inc., Google LLC, Hewlett Packard Enterprise, Microsoft Corporation, and Qualcomm Incorporated met separately with Aaron Goldberger, Legal Advisor to Chairman Pai, Erin McGrath, Legal Advisor to Commissioner O’Rielly, Christopher McGillen, Legal Intern in Commissioner O’Rielly’s office, William Davenport, Legal Advisor to Commissioner Starks, and Umair Javed, Legal Advisor to Commissioner Rosenworcel. A complete list of participants from each meeting is attached to this letter.

During the meetings, we discussed the Commission’s proposals in its Notice of Proposed Rulemaking in the above-referenced dockets to open the 6 GHz band for unlicensed broadband. We expressed support for the NPRM’s framework, its recognition of the need for additional unlicensed frequencies, and the importance of FCC rules implementing a framework that would support intensive use of the band. We explained that authorization of low-power, indoor-only devices throughout the band is critical to this goal as AFC control may be incompatible with a number of important use cases and device price points. Likewise, we highlighted the importance of authorizing very-low-power devices—at power levels 160 times lower than today’s Wi-Fi—to enable important short-range, portable applications. Finally, we discussed the Commission’s proposals to protect important incumbent services in the band and the engineering analysis our companies have provided on the record to show how the framework for the 6 GHz band will protect licensees from harmful interference.

Sincerely,



Paul Margie

*Counsel to Apple Inc., Cisco
Systems, Inc., Facebook, Inc.,
Google LLC, Hewlett Packard
Enterprise, and Microsoft
Corporation*

Cc: Meeting participants

Ms. Marlene H. Dortch

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MEETING ATTENDEES

Dan Mansergh, Apple Inc.

Mary Brown, Cisco Systems, Inc.

Thomas Navin, Facebook, Inc.

Megan Stull, Google LLC (meetings with William Davenport and Erin McGrath)

Bret Wincup, Hewlett Packard Enterprise

Paula Boyd, Microsoft Corporation

John Kuzin, Qualcomm Incorporated

Paul Margie, Harris, Wiltshire & Grannis LLP

Paul Caritj, Harris, Wiltshire & Grannis LLP (meetings with Umair Javed and Aaron
Goldberger)

Joely Denkinger, Harris, Wiltshire & Grannis LLP (meetings with William Davenport and Erin
McGrath)