



July 27, 2016

Julius Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
455 12th St. SW
Washington DC 20554

RE: Public Notice in Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band ET Docket No. 13-49

Dear Mr. Knapp:

On June 1, 2016, the Federal Communications Commission published a Public Notice in the above-captioned docket that, among other things, calls for the submission of prototype devices demonstrating sharing techniques operating in the 5850-5925 MHz band. The Public Notice created a deadline of July 30, 2016 for the submission of prototypes, but also delegated to the Office of Engineering and Technology the authority to grant waivers or extensions of the deadline or requirements as necessary. By this letter, Cisco requests a short delay to August 18, 2016, for the submission of its prototype device. To be clear, Cisco may be able to submit the device prior to August 18th, depending on the progress of internal testing. Cisco will endeavor to complete its work as promptly as possible and to deliver its device as quickly as possible.

From the beginning of this docket, Cisco has championed a sharing proposal we call "detect and vacate" that, simply stated, detects Dedicated Short Range Communications (DSRC) signals and then vacates the 5850-5925 MHz band. Through the work of the Tiger Team, and through partnering with the auto industry and Denso International America, Inc., Cisco has continued to develop and evolve its proposal to attempt to find the optimum way in which IEEE 802.11ac radios could share with DSRC radios without causing harmful interference to DSRC and enabling DSRC systems to perform their important safety of life mission. Due to prototype production timelines, and previously scheduled business travel on the part of Cisco staff overseeing the testing of the prototype (e.g., attendance at standards meetings), we will be unable to complete our internal review by July 30. But we believe that work can be

completed very promptly in early August, and we will be well positioned to submit a device to you on or before August 18, 2016.

We therefore request your approval to provide the device no later than August 18, 2016.

Respectfully submitted,

Cisco Systems, Inc.

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