

August 1, 2016

Ex Parte

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

Re: 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 July 28, 2016, David Don and Joe Attanasio of Comcast, Rob Alderfer of CableLabs (who participated telephonically), as well as Paul Caritj and I of Harris, Wiltshire & Grannis, LLP met with Julius Knapp, Chief, OET and Ira Keltz, Deputy Chief, OET. We discussed the Wi-Fi Alliance effort to develop a test plan that will ensure fair coexistence among LTE-U and Wi-Fi devices.

We also discussed the attached chart, which summarizes real-world measurements of received signal strengths (“RSSI”) for clients and access points in a combination of indoor and outdoor Wi-Fi networks. These data show that approximately half of all measured Wi-Fi connections operate at an RSSI of less than -82 dBm. These data show that the proposal advanced by CableLabs and others to use a Wi-Fi RSSI of -82 dBm in the Wi-Fi Alliance test plan is an extraordinary compromise on the part of Wi-Fi proponents because it would mean that the test plan leaves half of all outdoor Wi-Fi connections vulnerable to LTE-U degradation. CableLabs and others have nonetheless advanced this proposal in order to move the test plan to conclusion.

Pursuant to the FCC’s rules, I have filed a copy of this notice electronically in the above-referenced proceeding. If you require any additional information, please contact the undersigned.

Sincerely,



Paul Margie
Counsel to Comcast

cc: Meeting participants

Real World Signal Level Data from Over 1 Million Wi-Fi Measurements

