



The Internet & Television Association  
25 Massachusetts Avenue, NW | Suite 100  
Washington, DC 20001  
(202) 222-2300

**Danielle Piñeres**  
Vice President & Associate General Counsel

o (202) 222-2459 e dpineres@ncta.com

August 7, 2019

**Ex Parte**

Ms. Marlene H. 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 August 5, 2019, Colleen King and Audrey Connors of Charter Communications, Inc., Brian Josef of Comcast Corporation, Barry Ohlson of Cox Enterprises, Inc., Margaret Tobey of NBCUniversal Media, LLC, Renee Gregory of Willkie Farr & Gallagher LLP (representing NCTA – The Internet & Television Association (NCTA)), and Jared Sher and myself of NCTA met with Erin McGrath, Legal Advisor, Wireless, Public Safety, and International to Commissioner Michael O’Rielly, Will Adams, Legal Advisor, Wireless to Commissioner Brendan Carr, and William Davenport, Chief of Staff and Senior Legal Advisor for Wireless and International to Commissioner Geoffrey Starks regarding the above-referenced dockets.

Consistent with NCTA’s comments filed in this proceeding,<sup>1</sup> NCTA and its member companies expressed support for authorizing unlicensed use of the full 1200 megahertz of 6 GHz spectrum provided that existing incumbent operations—including C-Band Fixed Satellite Services uplink (C-Band uplink), Fixed point-to-point links, Broadcast Auxiliary Services (BAS), Cable Television Relay Services (CARS), and Low Power Auxiliary Stations (LPAS)—can be fully protected. We highlighted the importance of unlicensed services like Wi-Fi to the broadband experience of American consumers and businesses and noted the growing need for additional unlicensed mid-band spectrum. Emerging Wi-Fi technologies such as Wi-Fi 6 will require 160 MHz channels to deliver the advanced speeds and capacity that American consumers expect to accompany 5G; unlicensed 6 GHz spectrum is essential to enabling Wi-Fi to meet consumers’ demands for next-generation connectivity. We also described the importance of

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<sup>1</sup> Comments of NCTA – The Internet & Television Association, ET Docket No. 18-295, GN Docket No. 17-183 (filed Feb. 15, 2019); Reply Comments of NCTA – The Internet & Television Association, ET Docket No. 18-295, GN Docket No. 17-183 (filed March 18, 2019).

C-band uplink for the delivery of television programming and how BAS and LPAS are critical to electronic newsgathering, live sports, and event production, and the need to ensure ongoing availability and capacity commensurate with future demand for these services.

NCTA and its members noted the importance of balancing the need for rules that facilitate robust Wi-Fi deployment with the need to protect existing incumbent services. First, we urged the Commission to authorize low-power, indoor use throughout all 6 GHz sub-bands without the need for Automated Frequency Coordination (AFC), while adopting measures to ensure that the indoor-use restriction can be enforced. We noted, however, that coexistence issues between indoor, low-power Wi-Fi and indoor BAS and LPAS operations remain to be addressed. Second, we advocated for light-touch AFC regulations that focus on the AFC's baseline responsibility to protect incumbents by identifying permissible frequencies on which access points may operate at a given location. We explained that the Commission should not require staged development of the AFC, specify a funding mechanism, or decide whether the AFC should be centralized or decentralized.

With respect to the protection of C-band uplink operations, NCTA and its members expressed optimism that coexistence issues could be resolved and discussed support for the adoption of an antenna restriction for outdoor access points, much like the Commission adopted for the 5150-5250 MHz (U-NII-1) band, to limit aggregate noise at C-band uplink satellite receivers. However, we asked that the Commission decline to adopt a cap on aggregate interference, consistent with its precedent in the U-NII-1 proceeding.<sup>2</sup>

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

/s/ **Danielle J. Piñeres**

Danielle J. Piñeres

cc: Will Adams  
William Davenport  
Erin McGrath

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<sup>2</sup> *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, First Report and Order, 29 FCC Rcd 4127 ¶ 38 (2014) ("Consistent with Commission precedent, we will not numerically define 'harmful interference' here, beyond the current definition in our rules.").