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**VIA ELECTRONIC FILING**

September 11, 2017

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 201154

**Re: WRITTEN EX PARTE COMMUNICATION**

*Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, GN Docket No. 14-177; IB Docket No. 15-256; WT Docket No. 10-112; IB Docket No. 97-95.

Dear Ms. Dortch:

In the above referenced proceeding, Wi-Fi Alliance has consistently advocated that the Commission should permit use of the band 57-71 GHz on board aircraft.<sup>1/</sup> Among other things, in 2016 it submitted *ex parte* letters demonstrating that there is little likelihood of interference to Earth Exploration Satellite Services (“EESS”) or Radio Astronomy Services (“RAS”).<sup>2/</sup> Unfortunately, the Commission declined to permit use of any part of the 57-71 GHz band on board aircraft in the Report and Order it adopted, but invited parties to supplement the record in response to the Further Notice of Proposed Rulemaking.<sup>3/</sup>

On August 31, 2017, the Aerospace Vehicle Systems Institute (“AVSI”) filed a report containing a detailed analysis of potential interference from WiGig® systems to EESS and found that “... transmitters in compliance with 47 CFR 15.255 will comply with International Telecommunications Union (ITU-R) protection levels developed for the incumbent passive services and will not interfere with those services.”<sup>4/</sup> This report provides further technical evidence confirming that there is little likelihood of interference to EESS from WiGig® operations on board aircraft. In light of the AVSI

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<sup>1/</sup> See, e.g., *Reply Comments of Wi-Fi Alliance*, GN Docket No. 14-177 *et al.* at 7-8 (filed Oct. 31, 2016); *Comments of Wi-Fi Alliance*, GN Docket No. 14-177 *et al.* at 9-11 (filed Sept. 30, 2016); *Letter to Ms. Marlene H Dortch, Secretary, Federal Communications Commission, from Edgar Figueroa, President and CEO of Wi-Fi Alliance*, GN Docket No. 14-177 *et al.* (filed April 21, 2016) (“April 21 Ex Parte”); and *Letter to Ms. Marlene H Dortch, Secretary, Federal Communications Commission, from Edgar Figueroa, President and CEO of Wi-Fi Alliance*, GN Docket No. 14-177 *et al.* (filed April 16, 2016) (“April 16 Ex Parte”).

<sup>2/</sup> See, *April 16 Ex Parte* and *April 21 Ex Parte*.

<sup>3/</sup> See, *In the Matter of Use of Spectrum Bands Above 24 GHz for Mobile Radio Services et al.*, Report and Order and Further Notice of Proposed Rulemaking, 21 FCC Rcd. 8014 ¶¶ at 327-333 (2016).

<sup>4/</sup> *Letter to Marlene H. Dortch, Secretary, Federal Communications Commission, from David Redman, Director, Aerospace Vehicle Systems Institute*, GN Docket No. 14-177 (filed Aug. 30, 2017) at 1.

Study, Wi-Fi Alliance urges the Commission to permit the entire 57-71 GHz band to be used to meet the growing need for on-board communications.

Pursuant to Section 1.106 of the Commission's rules, a copy of this letter has been submitted in the record of the above reference proceedings. If there are any questions regarding the foregoing, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Edgar Figueroa', with a long horizontal flourish extending to the right.

**WI-FI ALLIANCE**

Edgar Figueroa  
President and CEO

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