



**QUALCOMM Incorporated**

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September 14, 2016

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Notification in ET Docket No. 15-105**

Dear Secretary Dortch:

Qualcomm met with Edward Smith, legal advisor to Chairman Wheeler, and Julius Knapp, Chief of the FCC Office of Engineering and Technology, to discuss LTE Unlicensed technologies on Monday September 12, 2016. Qualcomm was represented by Mingxi Fan, John Forrester, Durga Malladi, Ahmed Sadek, and the undersigned.

Qualcomm explained that it developed the LTE Unlicensed technologies (LTE-U, LAA, and MulteFire) to provide better mobile broadband for consumers, while ensuring from the outset that these technologies do not have any adverse impact on Wi-Fi and fairly share the U-NII-1 and U-NII-3 portions of the 5 GHz band. We provided an update on Qualcomm's participation in the development of the Wi-Fi Alliance LTE-U – Wi-Fi Coexistence Test Plan, which is supposed to be released on September 21, 2016, and we described Qualcomm's extensive technical collaboration with the Wi-Fi Alliance staff and Wi-Fi stakeholders. We reiterated that the test plan must be based on technical parameters for Wi-Fi that are derived from valid data, and that the plan should incorporate a fair multi-vendor Wi-Fi baseline, composed without making any alterations to Wi-Fi equipment that is widely deployed, as agreed upon in the joint contribution from Wi-Fi and LTE-U stakeholders submitted to the Wi-Fi Alliance. We highlighted our efforts to ensure that such a test plan is actually released on September 21<sup>st</sup> and described our attempts to reach consensus on outstanding issues.

Qualcomm reiterated that deployments of these innovative technologies will successfully co-exist with Wi-Fi and that the FCC's policy of enabling permission-less innovation through technology-neutral regulation under Part 15 is vitally important for the American public. The public interest lies in allowing LTE Unlicensed technologies to come to market in unlicensed spectrum as just the kind of innovation that the FCC's Part 15 rules are designed to enable.

Respectfully submitted,

Dean R. Brenner  
Senior Vice President, Government Affairs

cc: Edward Smith  
Julius Knapp