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September 22, 2016

**VIA ELECTRONIC FILING**

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

Re: **Notice of Oral *Ex Parte* Communication**

*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 September 21, 2016, Kevin Robinson, Alex Roytblat, and I, all of Wi-Fi Alliance, spoke by telephone with Edward Smith, Legal Advisor to Chairman Wheeler, and Julius Knapp, Ira Keltz, and Rashmi Doshi of the Office of Engineering and Technology, regarding the above-captioned matter.

***Test Plan Released***

We expressed our appreciation for the Commission's continuing interest and support in Wi-Fi Alliance's sponsorship of an industry-developed Coexistence Test Plan ("Test Plan"), the purpose of which is to measure the impact of a device using Long Term Evolution protocol in unlicensed spectrum ("LTE-U") on a Wi-Fi network. Wi-Fi Alliance is pleased to announce that it has released version 1 of the Test Plan, a copy of which is attached to this letter and which may be downloaded at: <https://www.wi-fi.org/file/coexistence-test-plan>. We noted that the development of the Test Plan was an industry-collaborative effort, involving dozens of companies from multiple industries, including the Wi-Fi and LTE-U industries. It is the only mechanism that considers all the scenarios agreed upon by industry participants to assess fairness to Wi-Fi. All parties made significant investments and compromises in order to produce the Test Plan and tried in good faith to accommodate reasonable requests.

## ***Test Plan Features***

While we did not discuss every element of the test plan, we highlighted the following:

- Wi-Fi Alliance may release updated versions of the Test Plan, as appropriate and if required.
- The Test Plan is intended to be an integrated document; “picking and choosing” among components of the test plan is not considered satisfaction of the Test Plan. Wi-Fi Alliance opposes any attempt to break up the Test Plan or its use in parts.
- The Test Plan includes three energy levels; the lowest level is -82 dBm. There is no differentiation between indoor and outdoor applications.
- The Test Plan is intended to be technology agnostic. It therefore does not differentiate among potential LTE-U implementations or the different technology options that may be incorporated in LTE-U equipment.
- The test bed devices associated with the Test Plan include a range of Wi-Fi equipment – a mix of enterprise and consumer grade equipment – from different vendors, including different chipsets. They are used both to determine pass/fail criteria, and to observe the impact of the LTE-U devices on various Wi-Fi networks. This set-up accommodates a request for a Wi-Fi multi-vendor test approach.
- Because, by request, the equipment in the test bed includes consumer devices and older generation Wi-Fi devices, Wi-Fi Alliance may change and expand the list of Wi-Fi devices for the test bed set-up over time, since the Wi-Fi devices will experience end of life naturally.
- The Wi-Fi devices in the test bed set up must be Wi-Fi CERTIFIED for interoperability to eliminate unexpected proprietary behavior that could impact test execution.

## ***Test Plan Implementation***

LTE-U vendors may take their equipment to test organizations qualified to perform the tests and could presumably share the results with stakeholders and customers. Those third-party laboratories will conduct their own Wi-Fi multi-vendor calibration to determine pass/fail criteria. This will reflect exactly how the Wi-Fi equipment used in the test bed behaves onsite at the test organizations, and will be the basis against which LTE-U devices will be measured. Wi-Fi Alliance will regularly monitor test organizations to ensure quality and integrity of test results – just as we do for our own test programs. Wi-Fi Alliance will not launch its own certification program for testing contemplated under the Test Plan.

## ***Next Steps***

Wi-Fi Alliance continues to believe that a regulatory solution to Wi-Fi/LTE-U coexistence is not necessary; industry cooperation is the better approach. Therefore, Wi-Fi Alliance will promote the use of the Test Plan, encouraging service providers in particular to require satisfaction of the Test Plan for products they offer with LTE-U. However, it would be

regrettable if the industry's investment and good faith efforts led nowhere. Chairman Wheeler directed the industry to provide a means to address Wi-Fi/LTE-U sharing, and the industry has made meaningful efforts to take that directive seriously. We therefore urge the Commission to support and encourage the use of the Test Plan for all LTE-U equipment subject to its equipment approval processes.

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Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket and provided to the FCC staff shown below. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



**WI-FI ALLIANCE**

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Attachment

cc: (each electronically, with attachment)  
Edward Smith  
Julius Knapp  
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