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

**Re: ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band*
GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum*
Between 3.7 and 24 GHz
Ex Parte Communication**

Dear Ms. Dortch:

On September 24, 2019, George Kizer, Chairman of the Technical Committee of the Fixed Wireless Communications Coalition, made a presentation to the 8th Annual Spectrum Management Conference in Washington, DC, on issues that bear on the above-referenced proceedings. Commission officials were in attendance.

Pursuant to 47 C.F.R. § 1.1206(b)(2) of the Commission's rules, I am attaching a copy of Mr. Kizer's presentation.

Please contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mitchell Lazarus".

Donald J. Evans
Mitchell Lazarus
Counsel for the Fixed Wireless
Communications Coalition

What future for the unlicensed and licensed services in the 6 GHz band?

George Kizer
Technical Committee Chairman
Fixed Wireless Communications Coalition
President, National Spectrum Management Association



The 8th Annual **Americas**
Spectrum Management Conference

September 24 - 25, 2019 | Washington D.C. USA

ForumGlobal



What future for the unlicensed and licensed services in the 6 GHz band?

History

- ❑ For the last 35 years the bulk of the Fixed Service Point-to-Point microwave systems (Part 101) have been frequency managed in such a way that all mw paths are protected from harmful interference
- ❑ Safety-critical services, requiring 99.999% to 99.9999% reliability, require full interference protection all the time



What future for the unlicensed and licensed services in the 6 GHz band?

So What's New?

- ❑ RLAN consortium proposes to introduce 958,062,017 unlicensed Wireless point to point devices into the 5.925 to 7.125 GHz band
- ❑ Two service are proposed
 - Relatively high-power RLAN transmitters managed by an Automatic Frequency Coordination (AFC) function
 - Unmanaged indoor (30 dBm EIRP) and outdoor (14 dBm EIRP) RLAN transmitters
- ❑ The Commission made clear “we emphasize our commitment to preserve and protect the important base of incumbent users in these frequency bands [FCC 18-147, §2]”
- ❑ The courts have ruled that the FCC’s authorizing unlicensed devices that cause harmful interference to a licensed service would be unlawful
- ❑ Fixed Point-to-Point critical-mission users are concerned about possible reductions in interference protection

What future for the unlicensed and licensed services in the 6 GHz band?

What is interference protection?

RLAN Coalition's Perspective

- ❑ The “vast majority” of FS paths will be protected
 - RLAN calculations emphasize “average” interference cases -- irrelevant
 - actual interference comes from atypically located “corner cases” -- which RLAN interests admit they ignore



What future for the unlicensed and licensed services in the 6 GHz band?

What is interference protection?



FS Incumbents' Perspective

- All FS paths must be fully protected
 - Interference protection from ALL RLAN transmitters is required (i.e., all RLAN transmitters must be actively managed)
 - Path availability degradation is not acceptable
 - Traditional and proven interference criteria must be used

What future for the unlicensed and licensed services in the 6 GHz band?

What is interference protection?

RLAN and FS Operators are philosophically opposed

- ❑ RLAN operators – protect the “typical” FS receiver from “average” interference
- ❑ FS operators – protect every FS receiver all the time



What future for the unlicensed and licensed services in the 6 GHz band?

Questions?

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FIXED WIRELESS COMMUNICATIONS COALITION