

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Use of Spectrum Bands Above 24 GHz For	)	GN Docket No. 14-177
Mobile Radio Service	)	

To: The Commission

**REPLY COMMENTS  
OF THE  
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.415 of the Federal Communications Commission (“FCC” or “Commission”) rules, is pleased to submit Reply Comments in response to the Third Further Notice of Proposed Rulemaking in this proceeding,<sup>1</sup> as it relates to the proposed Licensing Framework for the 37-37.6 GHz band (“Lower 37 GHz Band”). EWA agrees that maintaining the Lower 37 GHz Band for shared, non-exclusive use by non-Federal and Federal users “will promote access to spectrum by a wide variety of entities, support innovative uses of the band, and help ensure that spectrum is widely utilized.”<sup>2</sup> These objectives will be promoted by adoption of a licensing approach that facilitates co-primary sharing among entities through the use of third-party coordinators that have demonstrated their ability to manage the process in a time- and cost-efficient manner.

EWA and its predecessor organizations have been certified by the FCC to coordinate applications for shared Part 90 spectrum for more than 60 years. It handles more than 8,000 coordinations and requests for license modifications each year, including those for base/mobile,

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<sup>1</sup> *Use of Spectrum Bands Above 24 GHz For Mobile Radio Service*, GN Docket No.14-177, Third Further Notice of Proposed Rulemaking, CC 18-33 (2018) (“Third FNPRM”).

<sup>2</sup> *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*, GN Docket No. 14-177, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 8014 at ¶ 112 (2016).

mobile-only, and point-to-multi-point stations, all of which are processed on a first-come, first-served basis. It previously assisted in the registration of 3.65 GHz facilities pursuant to the FCC's shared, non-exclusive licensing framework for that band. More recently, it was selected by the FCC as the frequency coordinator for Medical Body Area Networks operating in the 2360-2390 MHz band.<sup>3</sup> EWA (then the Industrial Telecommunications Association, Inc.) also has a Memorandum of Understanding with the FCC Enforcement Bureau (then the Compliance and Information Bureau) that charges the Alliance with the responsibility of assisting in the mitigation of interference among all Part 90 non-public safety users.<sup>4</sup>

The Alliance has reviewed the Lower 37 GHz Band coordination framework recommended jointly by Intel Corporation/Cisco Systems, Inc. and by Starry, Inc. It agrees with both those commenters and with the FCC that coordination in this band should be “as simple and streamlined as is feasible.”<sup>5</sup> Unlike the innovative, but complex three-tier licensing structure adopted for the 3.5 GHz band with hierarchical rights to interference protection,<sup>6</sup> the non-exclusive, shared environment in the Lower 37 GHz Band does not require a Spectrum Access System-like spectrum management process. Once the FCC determines basic elements such as the geographic parameters of applications, if any; what criteria should be used when evaluating the potential for harmful interference; and how best to coordinate with Federal users, EWA is confident that a framework can be developed that will enable users to secure effective coordination of their applications on a timely and efficient basis.

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<sup>3</sup> Memorandum of Understanding Between the United States Government/Federal Communications Commission and the Enterprise Wireless Alliance Regarding Frequency Coordination for Medical Body Area Networks (Oct. 23, 2015).

<sup>4</sup> FCC Announces Joint Agreement for the Resolution of Interference Complaints in the Land Mobile Communications Industry, *Public Notice*, Report No. CI 98-7 (Apr. 29, 1998).

<sup>5</sup> Joint Comments of Intel Corporation and Cisco Systems, Inc. at 11 (filed Sept. 10, 2018).

<sup>6</sup> *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, GN Docket No. 12-354, Report and Order and Second Further Notice of Proposed Rulemaking, 30 FCC Rcd 3959 (2015).

The Part 90 and Part 101 coordination systems have worked effectively for many years. A similar process undoubtedly can be developed for the coordination of shared usage of the Lower 37 GHz Band. EWA looks forward to working with the Commission and other interested parties in implementing that coordination process, once the FCC has finalized the ground rules for this band.

Respectfully submitted,

**ENTERPRISE WIRELESS ALLIANCE**

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September 28, 2018