



November 7, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, ET Docket No. 18-295

Dear Ms. Dortch:

On November 5, 2019, Alison Neplokh, Robert Weller and the undersigned, all of the National Association of Broadcasters (NAB), met with Julius Knapp, Bahman Badipour, Michael Ha, Nicholas Oros, and Hugh VanTuyl of the Office of Engineering and Technology. During this meeting, NAB discussed its positions with respect to the above-referenced proceeding.

NAB does not oppose the consideration of unlicensed operations in portions of the 6 GHz band. With appropriate safeguards, including frequency coordination, NAB believes that unlicensed operations can co-exist with certain fixed wireless uses. However, the WiFi uses under consideration in this proceeding are fundamentally incompatible with mobile broadcast operations used for electronic newsgathering. Electronic newsgathering operations, unlike fixed uses, are itinerant and not subject to coordination.

Further, the solutions proposed to protect electronic newsgathering and other mobile uses of 6 GHz spectrum, including public safety operations, will be entirely ineffective. Restricting unlicensed operations to indoor use will fail to protect mobile users for at least two reasons. First, electronic newsgathering itself frequently takes place indoors and at similar power levels to WiFi. Second, there is no reason to believe that WiFi signals from indoor access points and devices will in fact remain indoors.

For these reasons, the Commission should not allow unlicensed operations in those portions of the 6 GHz band allocated for mobile use.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Patrick McFadden", with a long horizontal flourish extending to the right.

Patrick McFadden
Associate General Counsel,
National Association of Broadcasters

cc: Julius Knapp
Bahman Badipour
Michael Ha
Nicholas Oros
Hugh VanTuyl