

November 12, 2019

Ex Parte

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

Re: *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49; Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295.*

Dear Ms. Dortch,

On November 7, 2019, Audrey Connors of Charter Communications, Inc. spoke about the importance of unlicensed spectrum at an event attended by Julius Knapp, Chief, Office of Engineering & Technology.

During the event, Charter explained that unlicensed spectrum and Wi-Fi are critical components of its strategy to deliver a future of ubiquitous connectivity. Charter sees that the demand for Wi-Fi is the highest it has ever been, and growing every day, especially as the United States enters a more connected 5G world. Consumers are increasingly relying on Wi-Fi to connect to each other, access information, and manage devices in their homes. Additionally, many critical infrastructure systems rely on Wi-Fi to carry out financial transactions, manage safety and logistics operations at airports, operate railways, track and monitor container ports, and more.

Charter's network today supports more than 300 million devices, and carries an estimated 80 percent of wireless traffic in the home and office. Because of Wi-Fi and the broader unlicensed ecosystem's success however, existing unlicensed spectrum bands that support them are approaching exhaust conditions. To prevent exhaustion and ensure sufficient resources to support the next generation of connectivity, Charter emphasized a need for more unlicensed spectrum to be made available quickly. Specifically, the 5.9 GHz band represents the quickest path to opening an almost immediately usable 160 MHz channel, the necessary bridge to Gigabit and faster Wi-Fi. And the 6 GHz band represents the runway for the next wave of unlicensed innovation given its wide-bandwidth 160 MHz channels and 1200 MHz of spectrum.

Accordingly, Charter encouraged the Commission to continue to take an innovative and balanced approach to spectrum policy that encompasses sharing, including in the above-captioned dockets, as it did with the 3.5 GHz band, to help avert the impending unlicensed spectrum crunch and move us further along the path to 10G.

Respectfully submitted,

/s/ Audrey Connors

Audrey Connors
Senior Director
Government Affairs