

November 15, 2019

Hon. Ajit Pai, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Proposed Rule Making 18-295

Dear Chairman Pai,

This filing is in response to the *Members of the Unlicensed Spectrum Community* filing of November 5, 2019, and the *Signatories Representing Public Safety Providers and Critical Infrastructure Industries* in their filing of November 8, 2019.

It is irrefutable that there are millions of locations where the random deployment of unlicensed low-power indoor (LPI) and very-low-power (VLP) devices in the 6 GHz bands without AFC -- as proposed by *Members of the Unlicensed Spectrum Community* -- **will cause harmful and catastrophic interference** (see Exhibit A).

There has not been a single filing to dispute this fact since it was put forward in ECC's filing of October 1, 2019.

This interference would **disrupt commerce, impact critical communications infrastructure, and endanger public safety**, justifying concerns of the *Signatories Representing Public Safety Providers and Critical Infrastructure Industries*.

The solution is before the Commission: *Safe Area Coordination with AFC* (see ECC filings of March 14, 2019, and October 1, 2019). This would allow the safe and expeditious deployment of unlicensed devices in the 6 GHz bands because:

- ✓ It achieves the degree of safety expected by fixed service operators because it uses the procedures of TSB10 and Part 101.103 of the Rules -- including a prior coordination notice and peer review -- before unlicensed devices are deployed.
- ✓ It incorporates very simple, very low-cost AFC using existing hardware and software.
- ✓ It allows unlicensed devices to be safely deployed indoors and outdoors with the FCC-proposed EIRP of 36 dBm, and as high as the height of the Licensed Reference Station (for example, a 300-meter building), which would help close the Digital Divide -- the Commission's #1 Strategic Goal.

Respectfully submitted.

Michael Mulcay, Chairman & CTO

Encina Communications Corporation
6701 Democracy Boulevard, Suite 300
Bethesda, MD 20817
Telephone: 831-659-5618
Email: mike@encinacomm.com

cc:

The Honorable Brendan Carr
The Honorable Michael O'Rielly
The Honorable Jessica Rosenworcel
The Honorable Geoffrey Starks
Julius Knapp, OET