

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of Part 15 of the Commission's Rules)	ET Docket No. 13-49
to Permit Unlicensed National Information)	
Infrastructure (U-NII) Devices in the 5 GHz Band)	
)	

COMMENTS OF WI-FI ALLIANCE

Wi-Fi Alliance ®^{1/} submits these comments in response to the Public Notice issued in the above-referenced proceeding by the Office of Engineering and Technology (“OET”) regarding the report for Phase I of tests performed to evaluate potential sharing solutions between Unlicensed National Information Infrastructure (“U-NII”) devices and Dedicated Short Range Communications (“DSRC”) operations in the 5850-5925 MHz (“U-NII-4”) band.^{2/} Wi-Fi Alliance congratulates the Commission on the successful completion of Phase I and appreciates the Commission taking further steps to evaluate the potential use of the U-NII-4 band for Wi-Fi and other unlicensed applications. The need for additional spectrum to meet the growing demand for Wi-Fi connectivity remains acute. Accordingly, Wi-Fi Alliance urges the

^{1/} Wi-Fi®, the Wi-Fi logo, the Wi-Fi CERTIFIED logo, Wi-Fi Protected Access® (WPA), WiGig®, the Wi-Fi Protected Setup logo, Wi-Fi Direct®, Wi-Fi Alliance®, WMM®, Miracast®, Wi-Fi CERTIFIED Passpoint®, and Passpoint® are registered trademarks of Wi-Fi Alliance. Wi-Fi CERTIFIED™, Wi-Fi Protected Setup™, Wi-Fi Multimedia™, WPA2™, WPA3™, Wi-Fi CERTIFIED Miracast™, Wi-Fi ZONE™, the Wi-Fi ZONE logo, Wi-Fi Aware™, Wi-Fi CERTIFIED HaLow™, Wi-Fi HaLow™, Wi-Fi CERTIFIED WiGig™, Wi-Fi CERTIFIED Vantage™, Wi-Fi Vantage™, Wi-Fi CERTIFIED TimeSync™, Wi-Fi TimeSync™, Wi-Fi CERTIFIED Location™, Wi-Fi Location™, Wi-Fi CERTIFIED Home Design™, Wi-Fi Home Design™, Wi-Fi CERTIFIED Agile Multiband™, Wi-Fi Agile Multiband™, Wi-Fi CERTIFIED Optimized Connectivity™, Wi-Fi Optimized Connectivity™, Wi-Fi CERTIFIED EasyMesh™, Wi-Fi EasyMesh™, Wi-Fi CERTIFIED Enhanced Open™, Wi-Fi Enhanced Open™, Wi-Fi CERTIFIED Easy Connect™, Wi-Fi Easy Connect™, and the Wi-Fi Alliance logo are trademarks of Wi-Fi Alliance.

^{2/} *Office of Engineering and Technology Requests Comment on Phase I Testing of Prototype U-NII-4 Devices*, Public Notice, ET Docket No. 13-49, (rel. Oct. 29, 2018).

Commission to progress towards satisfying the unlicensed spectrum requirements that the Commission recognized in 2013.^{3/}

Access to the U-NII-4 can be particularly useful in meeting Wi-Fi spectrum needs. Opening this band would offer up to 75 megahertz of extremely desirable spectrum for future Wi-Fi technologies. As Wi-Fi Alliance previously observed “because the U-NII-4 band is adjacent to other bands already used by unlicensed technologies like Wi-Fi, the same equipment will be able to take advantage of additional capacity and offer higher speeds using wider bandwidths — assisting in meeting the challenges of rapidly growing demand for higher-bandwidth data streams.”^{4/} Next generation Wi-Fi wireless networking standards, such as Wi-Fi 6,^{5/} are intended to operate with wider channels to support a growing number of bandwidth-intensive Wi-Fi applications.^{6/} In short, unlicensed access in the U-NII-4 band has the potential to improve Wi-Fi availability and performance, enabling connectivity where and when it is needed most.

Wi-Fi Alliance is particularly encouraged that the test results confirm the U-NII-4 prototypes’ ability to detect DSRC signals and implement the post detection steps. These results amply demonstrate Wi-Fi industry’s commitment to invest in technological development to meet the Wi-Fi ecosystem’s expanding needs for additional spectrum capacity. In light of that, Wi-Fi

^{3/} *Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Notice of Proposed Rulemaking, ET Docket No. 13-49, 28 FCC Rcd 1769 ¶ 20 (2013).

^{4/} *Comments of Wi-Fi Alliance*, ET Docket No. 13-49 at 3 (filed July 7, 2016).

^{5/} See <https://www.wi-fi.org/discover-wi-fi/wi-fi-6>.

^{6/} See *National Instruments, Introduction to 802.11ax High-Efficiency Wireless*, White Paper, Jul. 24, 2017, available at <http://www.ni.com/white-paper/53150/en/>.

Alliance urges the Commission to expeditiously resolve remaining regulatory issues and to allow unlicensed use in the U-NII-4 band.

Respectfully submitted,

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