

December 13, 2018

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

Dear Ms. Dortch:

Attached please find a new report from RAND titled "The Potential Economic Value of Unlicensed Spectrum in the 5.9 GHz Frequency Band: Insights for Future Spectrum Allocation Policy" for inclusion in the above-referenced docket.

RAND is a nonprofit, non-partisan research organization dedicated to developing solutions to public policy challenges to help make communities throughout the world safer and more secure, healthier and more prosperous. Our research spans a wide range of policy issues, including health, education, labor, defense, civil justice, environment, and transportation. This research was made possible by private support from the Comcast Innovation Fund. The study was conducted independently by RAND and was subject to RAND's rigorous quality assurance processes.

The intention of this report is to help promote an objective and informed policy discussion. As such, I submit this report to the Commission as a contribution to the general discourse on the subject of the 5.9 GHz frequency band, as part of the ongoing dialogue on unlicensed spectrum allocation. This paper provides one possible measure of the potential economic value of the 5.9 GHz band were it to be fully allocated to unlicensed use. It does not measure the potential value of dedicated short-range communications (DSRC), and there are many factors that could affect the accuracy of our estimates. I am happy to answer questions sparked by reading this study.

Thank you,

Diana Gehlhaus Carew
Doctoral Fellow
RAND Corporation
T: (310) 393-0411 x5725
E: dcarew@rand.org