

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**Office of Engineering and Technology and
Wireless Telecommunications Bureau
Seek Information on Current Trends
in LTE-U and LAA Technology**

)
)
)
)
)
)
)

ET Docket No. 15-105

To: The Commission,

**Reply Comments of the American National Standards Institute (ANSI) -
Accredited Standards Committee C63®**

The Accredited Standards Committee C63® (ASC C63®) is responding to the comments of Aruba Networks, an HP company,¹ and their recommendation that ANSI ASC C63® extend its current work on wireless coexistence to the issues addressed in this docket. As Aruba Networks stated, ANSI ASC C63® has a long involvement in electromagnetic compatibility and more recently wireless coexistence. The Commission has adopted several of our standards, using them as the recognized test methods for demonstrating compliance with various parts of the Commission's rules. ANSI ASC C63® also has a long history of serving as a neutral body, facilitating the formation of consensus solutions to complex issues. We would gladly take the role Aruba Networks has suggested if it would be helpful to the Commission and the stakeholders on this issue.

As Aruba Networks reported ANSI ASC C63® does have a project developing test methods for evaluating wireless coexistence. The project is ANSI C63.27, *ANSI*

¹ Aruba Networks Comments to ET Docket 15-105, "LTE-U and LAA Technologies" dated June 11, 2015.

Standard for Evaluation of Wireless Coexistence, and is expected to enter the ballot process in the next few months. The officers leading this project are Mr. Stephen Berger of TEM Consulting, chair, Mr. Nicholas LaSorte of the FDA, vice-chair and Jason Coder of NIST, secretary.

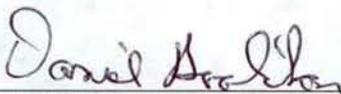
During the course of developing the ANSI C63.27 standard, the need for better spectrum data has become increasingly evident. Reliable information on the variation in RF environments, particularly those experienced by portable devices in bands such as the 2.4 GHz ISM band is not readily available. While a number of researchers have made measurements and reported their findings, there has not been a central location for vetting the measurements or allowing the results of various efforts to be analyzed as a composite data set in order to gain a broader view of the spectral environments in which these devices must operate. As a result, at our last meeting a study project was approved to address this need. The project is to be lead by Mr. Jason Coder of NIST. The project intends to address issues of measurement technique and data format with the purpose of allowing spectrum data from many sources to be visible and usable when performing more generalized analyses.

We would also note that ANSI ASC C63® has long served as a coordinating body. The FCC, FDA, NIST, DoD and other government entities are long standing members. Other standards developing organizations are also members. For this issue the membership of the IEEE, TIA, ITIC and SAE are noteworthy. Cooperative efforts among multiple standards developing organizations are a common occurrence over the history of ANSI ASC C63®.

In conclusion, we believe the recommendation of Aruba Network is well advised. We believe there is great benefit to consensus solutions. For this issue we share their observation that wireless coexistence is an area where accurate assessments are not currently possible, in part because there are no consensus test methods to be used for evaluating the potential impact of a proposed system on devices which have already been deployed. The purpose of ANSI C63.27 is to meet that need. The project has been underway for some time and has a well developed draft. We welcome the opportunity to apply that work to the issues raised in this docket and to serve as a neutral body for developing a consensus view on these issues.

Respectfully submitted,

ANSI ASC C63® Electromagnetic Compatibility

By: 
Daniel Hoolihan
Chairman, ANSI ASC C63®

Date: 22 July 2015

Annex A – ASC C63™ Membership

MEMBER	PRIMARY	ALTERNATE
ACIL	Hodes, Harry	Repella, John
Alcatel – Lucent	Moongilan, Dheena	Vacant
Apple, Inc.	Walia, Manjit	Sen, Indrandil
ARRL – The National Assoc. for Amateur Radio	Hare, Ed	Carlson, Kermit
Blackberry Corporation	Attayi, Masud	Attayi, Daoud
Bureau Veritas	Stewart, Jonathan	Vacant
CISCO Systems	Griffin, Andy	Case, Dave
Dell Inc.	Worley, Richard	Vacant
ETS – Lindgren	Chen, Zhong	Foegelle, Michael
Federal Communications Commission	Hurst, Bill	Jones, Steve
Food and Drug Administration	Silberberg, Jeffrey L	Witters, Don
Industry Canada	Nixon, Jason	Popovici, Horia
Information Technology Industry Council	Hirvela, John	Rosenberg, Joshua
IEEE – EMC Society	Norgard, John	Benitez, Henry
Liberty Labs	Howard, Mike	Langer, Brandt
Motorola Mobility	Knipple, Tom	Vacant
Motorola Solutions	Elliott, William [Mac]	Zakharia, Deanna
National Institute of Standards & Technology	Young, William	Coder, Jason
Northwest EMC	Ghizzone, Dean	Kiemel, Greg
PCTEST Engineering Laboratory	Snyder, Greg	Ward, Dennis
Society of Automotive Engineers	Andersen, Poul	Fenical, Gary
Sony Mobile	Hansson, Mats	Vacant
SPAWAR - US Navy	Dilay, Chris	Wojtaszek, Tomasz
Telecommunications Industry Association	Whitesell, Stephen	Vacant
Telecomm. Certif. Body (TCB) Council	Wall, Art	Stumpf, Bill
TÜV SÜD America, Inc.	Mills, Jim	Schaefer, David
UL-LLC	DeLisi, Bob	Moser, Jeffrey
US Department of Defense - Joint Spectrum Ctr.	Shellman, Marcus	Duncanson, Michael
Individual Members:		
INDIVIDUAL Member	Hoolihan, Daniel	None

INDIVIDUAL Member	<u>Lichtig, John</u>	None
INDIVIDUAL Member	Schaefer, Werner	None
INDIVIDUAL Member	Zimmerman, Dave	None
INDIVIDUAL Member	Berger, Stephen	None
INDIVIDUAL Member	<u>Heirman, Don</u>	None
Emeritus Members:		
MEMBER Emeritus	Kesselman, Warren	None
MEMBER Emeritus	Mertel, Herbert	None
MEMBER Emeritus	Hofmann, H. R. (Bob)	None