

August 26, 2015

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Letter in ET Docket No. 15-105

Dear Ms. Dortch:

We write today in response to the Wi-Fi Alliance's August 14, 2015 letter asking the Commission to withhold certification of any LTE-U equipment until the Wi-Fi Alliance develops a coexistence test plan and completes its own coexistence evaluation program of LTE-U's impact to Wi-Fi. As members of the Wi-Fi Alliance interested in extending the benefits of LTE on unlicensed spectrum to our customers, we urge the Commission to reject this unprecedented request. The Wi-Fi Alliance asks the Commission to take action that would have far reaching, negative consequences for the public, the industry, and Commission policy. Allowing an organization that certifies interoperability for one particular technology to become the gatekeeper for another technology to use unlicensed spectrum would jeopardize the Commission's entire framework that has made unlicensed spectrum so successful as an open platform for permission-less innovation.

To be clear, we are strong supporters of Wi-Fi. And we recognize and appreciate that new technologies must share unlicensed spectrum fairly. That concern was the very reason why the LTE-U Forum developed and released extensive etiquette protocols and coexistence testing requirements that ensure that LTE-U operates alongside Wi-Fi and other technologies as well as, if not better than, Wi-Fi does today.

The LTE-U Forum released etiquette protocols and coexistence testing requirements on March 2, 2015. Since then, we have worked continuously to educate the unlicensed community about this new technology, providing detailed technical specifications and extensive coexistence test-results. On March 9, 2015—just a week after LTE-U was unveiled at Mobile World Congress—the Wi-Fi Alliance and members of its Coexistence Technical Group were given a technical briefing on how LTE can be extended to unlicensed spectrum without negatively impacting other users.

The LTE-U Forum, its individual member companies, T-Mobile, and others quickly followed that briefing with individual- and group-outreach to other unlicensed stakeholders. These initial efforts culminated in two, back-to-back workshops hosted at Qualcomm's San Diego headquarters in May 2015. On May 27, there was an all-day technical briefing given to the Wi-Fi Alliance staff. The following day, the LTE-U Forum gave a second all-day technical briefing to the Wi-Fi Alliance and twenty eight other associations and companies. Both workshops included extensive technical presentations, robust question-and-answer sessions, and live LTE-U/Wi-Fi coexistence demonstrations in Qualcomm's test-lab. In fact, immediately after these workshops Qualcomm invited the Wi-Fi Alliance to do their own LTE-U/Wi-Fi

testing in Qualcomm's lab. Qualcomm had previously made a similar offer to others in the Wi-Fi community. These offers were not accepted. .

Instead, the Wi-Fi Alliance—three months later—filed its August 14 letter announcing its own initial workshop on coexistence in early November and plans for its own coexistence evaluation program. Although we belong to the Wi-Fi Alliance, they did not approach us or seek our input on this proposal; rather, we learned about its announcement when the Alliance filed its letter.

Since March, there have been extensive technical presentations on LTE-U within Wi-Fi Alliance forums focusing on LTE-U/Wi-Fi coexistence. No outstanding issues have been raised directly with us as a result of those presentations. In any event, we will continue to collaborate with the Wi-Fi Alliance and others in the unlicensed community and to answer their questions, ease their concerns, and address any issues that may arise as LTE-U is deployed.

In requesting to withhold certification of LTE-U equipment, the Wi-Fi Alliance disregards the FCC's rules and the August 5th letter from the Chief of OET. The August 5, 2015 letter stated that the Commission has placed LTE-U equipment on its "Pre-approval Guidance list" ensuring that Telecommunications Certification Bodies consult with the FCC Lab during the equipment authorization process. Under these procedures, the FCC, not an industry group such as the Wi-Fi Alliance, will ensure that the equipment complies with the FCC's rules.

The FCC should allow the process it initiated when it released its LTE-U/LAA Public Notice on May 5, 2015 to play out. It should maintain its long-standing approach of promoting innovation and enabling new technologies. And, most critically, it should reject the Wi-Fi Alliance's request to withhold certification of LTE-U equipment and become the self-appointed gatekeeper of unlicensed spectrum.

Respectfully submitted,

_____/S/
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