

November 24, 2015

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  
Written Ex Parte Presentation

Dear Ms. Dortch:

The undersigned associations and companies write to express their support for an extension of the June 2, 2016 deadline by which all U-NII-3 equipment sold in the United States must be compliant with Section 15.407. As suggested by Intel Corporation (“Intel”)<sup>1</sup> and NETGEAR Inc. (“NETGEAR”)<sup>2</sup> in their recent ex parte presentations, we agree that an extension of nine months following release of an order on reconsideration would be appropriate given the need for chip makers and equipment manufacturers to design compliant U-NII-3 products and distribute them through the supply chain to broadband providers, utilities and consumers.<sup>3</sup>

We appreciate the support of Intel and NETGEAR for our proposal to modify the out-of-band emission requirements, as proposed in our November 4, 2015 ex parte presentation, and of our Joint Petition for Waiver of the December 2, 2015 deadline to meet new equipment certification rules.<sup>4</sup> Further, we urge the Commission to act expeditiously to adopt our most recent out-of-band emission proposal and the extension requests in order to provide sufficient certainty and time for the marketplace to implement and test equipment, and sufficient time for the FCC to approve these devices before the deadline.

---

<sup>1</sup> See Letter from Peter Pitsch, Intel Corporation, to Marlene H. Dortch, FCC Secretary, ET Docket No. 13-49 (filed Nov. 6, 2015).

<sup>2</sup> See Letter from Mark Merrill, NETGEAR, Inc., to Marlene H. Dortch, FCC Secretary, ET Docket No. 13-49 (filed Nov. 11, 2015).

<sup>3</sup> See also email from David Boldy, Broadcom Corporation, to Mark Settle, ET Docket No. 13-49 (filed Nov. 18, 2015) (proposing extension of “last sell date” to December 2, 2017).

<sup>4</sup> See Joint Petition for Waiver filed by Alcatel-Lucent, *et al.*, ET Docket No. 13-49 (filed Nov. 5, 2015).

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

Alcatel-Lucent  
Cambium Networks, Ltd.  
Fastback Networks  
JAB Wireless, Inc.  
Mimosa Networks, Inc.  
Ubiquiti Networks, Inc.  
Zebra Technologies  
Wireless Internet Service Providers Association

cc: Julius Knapp  
Mark Settle  
Karen Rackley  
Aole Wilkins