



December 22, 2105

Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th St. SW
Washington DC 20554

RE: **EX PARTE** in 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:

Cisco Systems, Inc. ("Cisco") recently joined an ex parte filed by the Alliance of Automobile Manufacturers ("Alliance"), the Association of Global Automakers ("GlobalAutomakers"), and DENSO International America, Inc. ("DENSO") explaining testing done to date in the 5.9 GHz band that furthers the goal of Wi-Fi use of the 5850-5925 MHz band. Cisco's goal in participating in this testing initiative, following our participation in the IEEE Tiger Team, is to determine whether mitigation technology can be introduced into Wi-Fi operations that would protect Dedicated Short Range Communications ("DSRC"), and other incumbents in the band, from harmful interference.

The purpose of this filing is to highlight a revised view of possible Wi-Fi mitigation in the band, which Cisco presents as an evolution in our thinking from the IEEE Tiger Team proposal. The attachment provides that view.

Cisco does not intend to present the proposed mitigation as a definitive answer to how mitigation might work, but only intends to portray it as a subsequent iteration of the IEEE Tiger Team proposal that merits investigation. As with any sharing case, it is important not only to protect incumbent operations from harmful interference, but also to ensure that the burdens placed on the system with lesser rights enable reasonable use of the band. It is in the spirit of finding

that balance that Cisco seeks to place the attached mitigation in the record, and looks forward to responsive comments from the parties.

Respectfully submitted,

CISCO SYSTEMS, INC.

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