

May 4, 2016

Ex Parte

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:

On May 2, 2016, I spoke with Erin McGrath, Legal Advisor to Commissioner O'Rielly. On this call, we discussed questions that would assist the Commission in a Public Notice to refresh the record in the above-referenced proceeding. Specifically, we discussed the following questions:

1. The Commission should seek comment on whether it should adopt sharing rules based on a sense-and-avoid approach or a re-channelization approach. It should seek comment on what steps the Commission should take if it determines to re-channelize the band.
2. The Commission should request that any party citing to Dedicated Short Range Communications ("DSRC") or Wi-Fi performance or interference studies submit all available data and reports related to these studies. If there are data or reports that are non-public, these parties should describe the nature of these data and reports and explain why it is not possible to submit this information on the record.
3. The Commission should seek comment on whether there are industry-agreed-upon key performance indicators for DSRC, and, if so, seek comment on metrics and specific values, and whether there is a process by which DSRC products are held to these performance levels. This information would be useful in designing testing.
4. The Commission should seek comment on whether any field trials or analyses have been conducted on DSRC self-interference or interference from other services. How will DSRC systems prevent harmful interference caused by (a) other vehicle-to-vehicle crash-avoidance radios; (b) other in-vehicle intelligent-transportation-system ("ITS") radios; (c) road-side ITS units; (d) in-band fixed-satellite service ("FSS"); (e) adjacent-band FSS; (f) in-band government operations; and (g) adjacent-band unlicensed radios? What received-power tolerance levels do manufacturers assume to build their equipment to withstand interference from each source? At what distance and/or power do

manufacturers assume that one DSRC radio will not cause harmful interference to another DSRC radio if they are operating co-channel or adjacent channel?

5. DSRC shares the 5.9 GHz band with FSS and government users. The Commission should seek comment on how DSRC devices will protect FSS and government users from harmful interference from DSRC high- and low-power operations. Have any field trials or analyses been conducted on this question? If so, the Commission should request details on these tests or analyses.
6. The Commission should seek comment on whether any DSRC manufacturers or automobile companies plan to use the 5.9 GHz band for any of the following applications: (1) entertainment; (2) electronic commerce; (3) delivery of mapping, weather, or other non-safety information; (4) leasing of capacity to other entities for non-safety uses. The FCC's main goal in granting ITS licenses is to advance safety. The Commission should seek comment on whether it should adopt rules that limit the use of ITS licenses to crash-avoidance applications, and whether the FCC should adopt rules that contain a different interference or sharing approach for applications other than crash avoidance.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced proceeding. If you require any additional information, please contact the undersigned.

Sincerely,



Paul Margie
Counsel for NCTA

cc: Erin McGrath