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June 13, 2016

To: Mr. Dino Flore  
Mr. Satoshi Nagata  
3GPP  
-VIA EMAIL-

Re: Long Term Evolution Operation in Unlicensed Spectrum Must Not Interfere with Wi-Fi

Dear Mr. Flore and Mr. Nagata,

We write to you on behalf of Monmouth and Independence, Oregon to express our deep concerns regarding the potential harm 3GPP Long Term Evolution (LTE) unlicensed technologies will have on broadband access by impairing existing Wi-Fi investments our city and her residents currently rely on.

Monmouth and Independence remain committed to advancing broadband Internet access via Wi-Fi for our residents and visitors. we have read the letter sent to you by Ms. Maya Wiley on behalf of New York City, and we wholeheartedly agree with the concerns raised. As Ms. Wiley indicated in her letter, "any threat to Wi-Fi is a threat to the very fabric of the city." **Our residents depend on existing Wi-Fi networks as a key way to email, stream music and movies, make voice and video calls, access city services, pay utility and property tax bills, apply for jobs, book restaurant reservations and perform hundreds of other activities vital to our local economy.**

Monmouth and Independence have, and will continue to aggressively invest in Wi-Fi as a means of providing affordable Internet access to all our residents, including in schools, libraries and public spaces. These important projects for our communities include:

- Central School District and Western Oregon University have many Wi-Fi access points across nearly 20 buildings to serve 12,000 students every school day. These projects have already seen City investments of great significance, not to mention the tax dollars and tuitions committed to maintaining operational facilities.
- The cities maintain three library systems that provide Wi-Fi connectivity to patrons at all branches, supporting thousands of sessions on average every month. These widely used systems are very costly, and supported publicly and municipally.
- Both cities have traffic management software, smart meter, high tech fire control systems, emergency response teams, and medical facilities that depend upon Wi-Fi connectivity to serve 30,000 residents. These systems are maintained in part by cities, and in part by public tax bonds.

We are not only concerned about the negative impact that unlicensed LTE technologies could have on Monmouth's and Independence's public investments, but also the harm to our residents, who have made significant private investments in multiple devices that rely on Wi-Fi in their homes and businesses. Nationwide surveys show that, on average, seven in ten U.S. households have Wi-Fi Internet connections, including thousands in our city. On

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average, these households have nearly a dozen Wi-Fi enabled devices each! Because Monmouth and Independence already have a community-owned high-speed fiber optic system, the count of Wi-Fi enabled technology is significantly higher than the average.

While we are not necessarily wireless experts, we understand the two industry organizations most intimately involved in the development and improvement of Wi-Fi, IEEE and Wi-Fi Alliance, have submitted letters to you outlining specific concerns regarding how your unlicensed LTE technology decisions could impact Wi-Fi. We ask that 3GPP work closely and carefully with the Wi-Fi Alliance and IEEE to address those concerns as you move forward in your standardization work.

Finally, we believe that it is imperative that any version of LTE operating in the unlicensed frequency bands, including the License Assisted Access (LAA) standard under development in 3GPP, be specifically designed to operate without creating harm or disrupting existing Wi-Fi devices. We concur with New York City that any substantial loss of coverage area for a Wi-Fi hotspot could diminish the broadband access of our residents and business firms, while also degrading the value of millions of dollars of public and private investment. Additionally, any reduction in Wi-Fi performance that could undermine real-time services like innovative voice and video applications, should not be tolerated.

If there is a chance unlicensed LTE could harm the investments made by the City and our residents, we urge you to fix the technology before attempting to deploy it here. Failure to protect existing Wi-Fi networks would impose great harm and undermine the free and open nature of sharing the public airwaves that has contributed so richly to our residents' quality of life thus far.

Thank you for your thoughtful consideration. we look forward to your response and feedback as we continue to track the progress of this vitally important issue.

Sincerely,

John McArdle  
Mayor  
Independence, OR

John Oberst  
Mayor  
Monmouth, OR



Don Patten  
General Manager, MINET  
serving Monmouth &  
Independence

cc: Messrs. Julius Knapp, Edward Smith, Jonathan Wilkins, Federal Communications Commission

Mr. Joern Krause, 3GPP TSG RAN Secretary

Ms. Susanna Kooistra, 3GPP Liaison Coordinator

Mr. Edgar Figueroa, Wi-Fi Alliance

Mr. Paul Nikolich, Chair IEEE 802 LAN/MAN Standards Committee

Ms. Maya Wiley, Counsel to the Mayor of New York City