



10900-B Stonelake Boulevard, Suite 126 • Austin, TX 78759 USA
Phone: +1-512-498-WIFI (+1-512-498-9434) | Fax: +1-512-498-9435
www.wi-fi.org

May 27, 2013

Mignon Clyburn
Acting Chairwoman
Federal Communications Commission
445 12th St SW
Washington DC 20554

Larry Strickling
Assistant Secretary
National Telecommunications and Information
Administration
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington DC 20230

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Federal Communications Commission
Bureau / Office

Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, FCC ET Docket No 13-49

Dear Chairwoman Clyburn and Assistant Secretary Strickling:

Wi-Fi Alliance will soon be filing its comments in the above-captioned proceeding. Demand for Wi-Fi is exploding, and the 5 GHz band simply will not be able to support near-term growth without access to additional spectrum and updated technical rules. Furthermore, the 5 GHz band is the only band in the United States that has the potential to support 802.11ac, the next-generation of Wi-Fi technology. Unless the FCC designates the U-NII-2B and U-NII-4 bands for license-exempt use while also amending its existing rules to encourage greater utilization of all 5 GHz allocations, innovators and adopters will not be able to implement this new technology effectively. We, therefore, look forward to working with you as both the FCC and NTIA examine rule changes in the 5 GHz band to protect incumbents and to support Wi-Fi.

An important part of this process will be the effort to find ways for Wi-Fi equipment to share the U-NII-4 band with Intelligent Transportation Systems ("ITS") licensees. Our members are excited about the advent of connected vehicles, and we are proud that our membership now includes significant representation from the transportation industry. We have every incentive to ensure that Wi-Fi and ITS share the band in a way that benefits both communities.

With that goal in mind, Wi-Fi Alliance would like to emphasize several points.

- We agree that the transportation uses of the spectrum at 5.9 GHz may advance automotive safety, and that the 5.9 GHz band must continue to be a home for ITS as the technology progresses toward commercialization.
- We fully agree with NTIA, the FCC, and many transportation stakeholders, that in a shared U-NII-4 scenario, unlicensed devices must not cause harmful interference to ITS licensees.
- We advocate a collaborative effort by the FCC, the NTIA, and the Wi-Fi industry to determine the optimal rules for shared access that support both ITS and Wi-Fi use of the 5.9 GHz band. As NTIA recognized in its report on the 5350-5470 MHz and 5860-5925 MHz bands, a variety of sharing mechanisms could be adopted to permit ITS and Wi-Fi to coexist in U-NII-4.
- We believe Wi-Fi technology is complementary to certain ITS technologies under consideration. As such, we believe that the introduction of Wi-Fi to the U-NII-4 band has the potential to advance the cause of vehicle safety and to hasten the widespread implementation of ITS solutions by creating economies of scale among components used for communications and networking.
- We encourage the FCC, the NTIA, and all interested parties to participate in both the FCC and NTIA studies to in order to equip both agencies with the facts and findings they require to make the best decisions on the merits of the proposals.

Our commitment, through our members, is to participate and to provide the technology expertise to assist you in the decision process. As you continue to work through the issues raised in the proceeding, please reach out to the Wi-Fi Alliance for any assistance you might require.

Respectfully submitted

THE WI-FI ALLIANCE



Edgar Figueroa
President and CEO
10900-B Stonelake Blvd., Suite 126
Austin, Texas 78759
+1-512-498-9434
efigueroa@wi-fi.org

CC: Karl Nebbia, NTIA
Julius Knapp, FCC