

June 28, 2018

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: *Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz*,  
GN Docket No. 17-183

Dear Ms. Dortch:

The Dynamic Spectrum Alliance (“DSA”) is a global organization advocating for laws and regulations that will lead to more efficient and effective spectrum utilization. Our membership spans multinationals, small- and medium-sized enterprises, and academic, research, and other organizations from around the world, all working to create innovative solutions that will increase spectrum availability and improve utility, benefiting both consumers and businesses. Our primary goals are to close the digital divide by reducing the cost of deploying wireless networks, enable the Internet of Things, and alleviate the spectrum crunch.<sup>1</sup> The 6 GHz band presents an important opportunity to advance all three of these goals by employing simple and effective spectrum sharing techniques, extracting previously untapped value from a band that, while well-employed by incumbent licensees, nonetheless remains unused through most of the United States.

We therefore strongly support calls to open the 6 GHz band for unlicensed use and applaud recent proposals to avoid harmful interference using an automated, location-aware system of frequency coordination.<sup>2</sup> The Commission has already had great success in promoting investment in underutilized bands through state-of-the art spectrum sharing techniques. The 6 GHz band, however, presents a far simpler challenge, offering an opportunity to increase efficiency and capture previously untapped value with a straightforward approach. As proponents of 6 GHz sharing have noted,<sup>3</sup> 6 GHz incumbents generally present fewer

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<sup>1</sup> For more on the DSA, please visit [www.dynamicspectrumalliance.org](http://www.dynamicspectrumalliance.org).

<sup>2</sup> See Letter from Apple Inc., Broadcom Inc., Cisco Systems, Inc., Facebook, Inc., Google LLC, Hewlett Packard Enterprise, Intel Corporation, Microsoft Corporation, Qualcomm Incorporated, and Ruckus Networks to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 17-183 (filed June 12, 2018) (“6 GHz Sharing Letter”).

<sup>3</sup> Comments of Apple Inc., Broadcom Limited, Cisco Systems, Inc., Facebook, Inc., Google LLC, Hewlett Packard Enterprise, Intel Corporation, MediaTek Inc., Microsoft Corporation, and Qualcomm Incorporated at 11, GN Docket No. 17-183 (filed Nov. 15, 2017).

coexistence challenges than users of other shared-use bands. In the 3.5 GHz band, for example, mobile users will be more prevalent and federal users will operate in geographically and temporally variable ways, requiring the innovative SAS that the FCC approved. Sharing in the 6 GHz band, however, can be administered through geographically-targeted sharing with fixed links and protections for fixed-satellite operations based on elevation angle and EIRP limits that change only rarely.

Importantly, spectrum sharing in the 6 GHz band for unlicensed use promises to provide this Commission with the opportunity to have real deployment within the next few years, exactly when emerging 5G networks require this support.<sup>4</sup> Indeed, as sharing proponents have pointed out, the Commission need only establish high-level, functional requirements for a spectrum sharing and interference mitigation framework in 6 GHz. In these frequencies, it is more than sufficient for the Commission to require that clients be location-aware, be able to comply with exclusion zones defined to protect licensed incumbents, and adhere to basic technical limitations in order to prevent harmful interference.

From a spectrum-sharing and spectral efficiency perspective, therefore, the 6 GHz band represents a particularly promising opportunity. The Commission has a chance to dramatically increase the productivity of the 6 GHz band, adding hundreds of megahertz to the nation's unlicensed spectrum inventory, by adopting a set of effective but simple rules. We applaud Chairman Pai for committing to move quickly on this matter and urge the FCC promptly to issue a Notice of Proposed Rulemaking seeking to capitalize on this important opportunity.

Respectfully submitted,



Kalpak Gude  
President  
Dynamic Spectrum Alliance

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<sup>4</sup> Kalpak Gude, President, DSA, to Marlene H. Dortch, Secretary, Federal Communications Commission at 2, GN Docket No. 17-183 (filed Oct 4, 2017).