

August 30, 2021

VIA ECFS
Ex Parte

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

Re: *Unlicensed use of the 6 GHz Band, OET Docket No. 18-295*

Dear Ms. Dortch:

The Dynamic Spectrum Alliance (“DSA”)¹ submits this letter in response to the recent ex parte by The Wireless Innovation Forum (the “WInnForum”) in the above captioned proceeding regarding the process by which the Federal Communications Commission (“FCC”) intends to certify Automated Frequency Coordination (“AFC”) systems and associated unlicensed devices. In its filing, the WInnForum noted that the AFC certification process “could be lengthy if required to wait for FCC to perform AFC system testing, or select (and possibly accredit) third-party labs,” and asked about ways the process could be streamlined and shortened.


The DSA shares the concerns of the WInnForum and also encourages the FCC to move rapidly to launch and complete the AFC certification process so that the full range of unlicensed devices may commence operations in the 6 GHz band while ensuring protection of incumbent services. The entire 1200 MHz of spectrum in the 6 GHz band (and then some) will be required to meet the projected demand for mid-band unlicensed / licensed-exempt spectrum for RLANs and other uses. Such demand includes standard power and outdoor devices that must connect to an AFC to safely operate in this band. Given that AFC systems do not need to coordinate with one another under the rules that the FCC adopted for the band, the certification process should be

¹ The Dynamic Spectrum Alliance is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small- and medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. A full list of the DSA members is available on the DSA’s website at www.dynamicspectrumalliance.org/members/.

much simpler and faster than what was required for shared access system certification in other bands, such as TV White Spaces or CBRS.

The success of unlicensed use of the 6 GHz band is dependent on the development of a robust ecosystem, not only here in the United States, but also internationally. As regulators worldwide consider whether and how to permit unlicensed operations in the 6 GHz band, they are looking to the U.S. market and experience as guidance. The FCC has led the development and introduction of innovative dynamic spectrum access frameworks that have enabled new business opportunities for a wide range of users and use cases. Rapid certification and introduction of AFC systems and associated devices will provide further leadership as well as reassurance to other regulators that the U.S. regulatory approach and the use of dynamic shared access systems are sound and feasible. The DSA urges the FCC to move forward expeditiously with AFC system and device certification and thereby accelerate the introduction of the full range of unlicensed devices that will operate in the 6 GHz band.

Sincerely,



Martha SUAREZ
Presidente
Dynamic Spectrum Alliance