

September 14, 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 and ET Docket No. 21-352

Dear Ms. Dortch:

On September 13, 2021, Martha Suarez of the Dynamic Spectrum Alliance (“DSA”),¹ Chris Szymanski of Broadcom, Matthew MacPherson of Cisco, David Wright of HPE Aruba, and Jennifer McCarthy of Federated Wireless spoke with Ethan Lucarelli, the Acting Legal Advisor to the Acting Chairwoman regarding the above-captioned proceedings and the process by which the Federal Communications Commission (“FCC”) intends to certify Automated Frequency Coordination (“AFC”) systems and Standard Power unlicensed devices.

The DSA commended the FCC for its recent release of the draft Public Notice outlining the AFC certification process and encouraged the FCC to continue to work rapidly and to expedite AFC certification so that the full range of unlicensed devices may commence operations in the 6 GHz band while ensuring protection of incumbent services. Standard Power operations will support outdoor, indoor higher power, and indoor connectorized antenna deployments, and the DSA reiterated how important the success of AFC systems and Standard Power devices will be to the development of a comprehensive unlicensed ecosystem here in the United States as well as around the world.

Also discussed were the lessons learned from the spectrum access system certifications in other bands, including TV White Spaces and CBRS. The DSA encouraged the FCC to streamline to the greatest extent possible the process for accepting and reviewing AFC applications as well as

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/.

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completing the public trial period. Without the need for inter-AFC system coordination, the time required for the certification and public trial period can be significantly reduced without disadvantaging the development of competitive AFC system approaches.

Finally, the DSA and its members look forward to working with the FCC staff to complete AFC system and device certification and to accelerate the introduction of the full range of unlicensed devices that will operate in the 6 GHz band.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS', is written over the printed name 'Martha Suarez'.

Martha Suarez
President
Dynamic Spectrum Alliance