

December 21, 2021

**VIA ECFS**

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:

The Dynamic Spectrum Alliance (“DSA”)<sup>1</sup> submits these comments regarding the Automated Frequency Coordination (“AFC”) system initial proposals submitted last month to Federal Communications Commission (“FCC” or “Commission”). Authorization of AFC systems is a critical part of the Commission’s efforts to make the 6 GHz band (5.925–7.125 GHz) available for unlicensed broadband operations. The DSA is pleased to note that fourteen different initial proposals were submitted, including several by members of the DSA. We believe this strong showing of interest demonstrates industry’s commitment to making the 6 GHz band a spectrum sharing success story.

The DSA encourages the FCC to continue the momentum by expediting review of these proposals and defining the remainder of the AFC certification process so that standard power unlicensed devices may commence operations in the 6 GHz band while ensuring protection of incumbent services. Given that the entire 1200 MHz of spectrum in the 6 GHz band will be required to meet the projected demand for mid-band unlicensed / licensed-exempt spectrum for RLANs and other uses, the success of AFC systems and associated devices will be critical to the development of a robust ecosystem here in the United States as well as around the world. Other countries are closely watching the U.S. experience with spectrum sharing in the 6 GHz band, with a significant percentage having either opened or actively considering opening the band for unlicensed shared access. The vast majority of these countries have authorized low-power indoor device operation but are waiting to see how standard power and AFC system deployments

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<sup>1</sup> 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/](http://www.dynamicspectrumalliance.org/members/).

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fare in the United States. Continuing in its leadership role, the FCC can help drive further adoption of AFC systems and standard power devices and assist in achieving global scale in the 6 GHz band.

The DSA encourages the FCC to streamline to the greatest extent possible the lab testing and public trial period phases of AFC and standard power device certification by finding opportunities for parallel tracks to be followed and by leveraging the existing third-party lab certification process. Reliance on the existing third-party labs will accelerate testing and certification and provide a scalable approach for other countries to follow.

The DSA and its members look forward to working with the FCC staff to complete AFC system and device certification and 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 and title of Martha Suarez.

Martha Suarez  
President  
Dynamic Spectrum Alliance