

November 5, 2019
VIA ELECTRONIC FILING

Hon. Ajit Pai, Chairman
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

RE: *Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295; *Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz*, GN Docket No. 17-183

Dear Chairman Pai,

As members of the unlicensed spectrum community—including the Wi-Fi industry, mobile industry, fixed wireless service providers bridging the digital divide in rural areas, public interest groups, semiconductor manufacturers, and anchor institutions—we applaud your continued commitment to opening the 6 GHz band for Wi-Fi and look forward to quick action by the FCC.

The Wi-Fi industry powers 13 billion devices worldwide and is on pace to contribute \$993 billion in annual U.S. economic activity by 2023. In short, Wi-Fi has become the single most important wireless technology for American consumers and businesses.

Under your leadership, the FCC's *5G FAST Plan* has set the course for American leadership in the next generation wireless networks that will fuel the future. That is why we are proud of our efforts to help the Commission move forward on the *Unlicensed Use of the 6 GHz Band* proceeding. The unlicensed community has been steadfastly working with technical experts and conducting detailed engineering analyses that demonstrate how coexistence between incumbent and new unlicensed users will work. These analyses include very-low-power (VLP) and low-power indoor (LPI) devices and use cases that will be deployed quickly, in addition to an Automated Frequency Control (AFC) system to ensure standard-power unlicensed devices do not cause harmful interference. As you stated in Congressional testimony on October 17, 2019, "...American consumers can have the best of both worlds. They can have electric utilities using the spectrum in a way that allows them to deliver power more efficiently, and they can have the benefit of unlicensed innovation."

Opening up the 6 GHz band for these unlicensed innovations will benefit every aspect of our economy. This next generation of super-fast Wi-Fi and 5G NR Unlicensed will usher in a new era of AR/VR consumer experiences, revolutionize our agricultural economy by powering precision farming, and enable the expansion of industrial IoT, which will be the backbone of our factories of the future. Moving forward and opening up the 6 GHz band is critical. It has been more than twenty years since new mid-band spectrum was made available for Wi-Fi and other unlicensed uses, causing a severe shortage for a wireless technology that handles 75% of mobile data traffic.

We can have "the best of both worlds." Over a year of deep engineering analysis makes it clear that coexistence can be enabled while maximizing the efficiency of the 6 GHz band and utilizing the productive potential of this spectrum to its highest potential. Our collective view is aligned with your statement to the Senate, "Let's protect the incumbent users, but let's also have our eyes on the future. And the future in many cases is dependent on Wi-Fi."

Respectfully,



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