

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Office of Engineering and Technology Seeks)
Comments on Wi-Fi Alliance Request for)
Waiver of Section 15.407(1)(2) of the) ET Docket No. 23-107
Commission’s Part 15 Rules for AFC System)
Operation in the 6 GHz Band)

COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance (“DSA”)¹ hereby submits these comments in response to the above-referenced Office of Engineering and Technology public notice (“PN”) requesting comments on the Wi-Fi Alliance Request for Waiver (“WFA Waiver Request”)² of Section 15.407(1)(2) of the Commission’s rules related to the predictive propagation models that automated frequency coordination (“AFC”) systems in the 5.925-6.425 GHz and 6.525-6.875 GHz frequency bands (“6 GHz Band”) must employ.³

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/.

² Wi-Fi Alliance, Request for Waiver, ET Docket No. 21-352 (filed February 17, 2023), available at <https://www.fcc.gov/ecfs/document/10217816203286/1>.

³ *Office of Engineering and Technology Seeks Comments on Wi-Fi Alliance Request for Waiver of Section 15.407(1)(2) of the Commission’s Part 15 Rules for AFC System Operation in the 6 GHz Band*, Public Notice, ET Docket No. 23-107, DA 23-239 (Mar. 21, 2023).

In the WFA Waiver Request, the Wi-Fi Alliance seeks flexibility for its AFC system to incorporate building entry loss (“BEL”) attenuation into its calculations when assessing channel availability and power constraints for composite devices that are authorized to operate in both lower power indoor (“LPI”) and standard power (“SP”) mode (“Composite Devices”).⁴ Given that Composite Devices must, by definition and design, adhere to Product Form Factor (“PFF”) rules that the Commission established for LPI devices to prevent outdoor operation, the Wi-Fi Alliance argues that its AFC system can differentiate Composite Devices from other types of 6 GHz unlicensed devices and can, therefore, selectively apply BEL attenuation to those devices.⁵

The DSA supports the WFA Waiver Request and urges the Commission to grant it expeditiously so Composite Devices will be able to benefit from greater access to the 6 GHz Band, while also meeting the Commission’s protection requirements for incumbent operations. The DSA agrees with Wi-Fi Alliance that its AFC system, as well as those of other conditionally approved AFC system operators – many of whom are DSA members – will be able to distinguish between Composite Devices and other certified 6 GHz Band devices. Dynamic spectrum management systems, such as the AFC, are designed to extract pertinent information from regulatory databases to enforce incumbent protections. Under the Commission’s rules, AFC systems are required to verify that the FCC ID of a registered SP device has been approved by OET for such operation. AFC systems can use this check to verify that the same FCC ID has

⁴ WFA Waiver Request.

⁵ Id.

been approved for LPI mode, conclusively establishing that the device has been certified as a Composite Device. Given that Composite Devices will be approved to operate in the 6 GHz Band only after demonstrating compliance with the PFF rules for LPI devices, it stands to logic that such Composite Devices will be limited to indoor operation where BEL signal attenuation will decrease the probability of interference from these devices with incumbent systems.

The DSA further agrees with the Wi-Fi Alliance that the ability for AFC system operators to calculate BEL attenuation in their calculations of available spectrum for Wi-Fi access points will result in increased access to the 6 GHz band and enable wider connectivity that will benefit the American homes and businesses. There is clearly growing demand for affordable and enhanced broadband access. Access to sufficient spectrum for SP devices will be critical for the provision of improved, adaptable Wi-Fi to those that require connectivity the most.

The DSA encourages the Commission to grant the WFA Waiver Request expeditiously and to consider granting such a waiver to all conditionally approved AFC system operators. The DSA and its members stand ready to assist the Commission in bringing the benefits of its 6 GHz sharing framework and the use of AFC systems to commercial reality in the very near future.

Respectfully submitted,



Martha SUAREZ
President
Dynamic Spectrum Alliance

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