

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)

REPLY COMMENTS OF THE DYNAMIC SPECTRUM ALLIANCE

The Dynamic Spectrum Alliance (“DSA”)¹ hereby submits these reply 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

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>.

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

The DSA reiterates its strong support for the WFA Waiver Request and the similar waiver requests filed by other conditionally approved AFC system operators. We urge the Commission to grant these waiver requests expeditiously. Not only will timely approval result in increased access to the 6 GHz band without jeopardizing ongoing incumbent operations, but it will also serve as an important precedent for regulatory authorities worldwide that are considering the use of AFC systems to manage standard power access to the band.

Other countries are closely watching the U.S. experience with spectrum sharing in the 6 GHz band and are debating whether and how building entry loss (“BEL”) can be incorporated by AFC systems. While many other countries have either already opened or are actively considering opening the band for unlicensed shared access, the vast majority are waiting to see how standard power and AFC system deployments fare in the United States before authorizing their use. Continuing in its leadership role, the FCC can help drive further adoption of AFC systems and standard power devices, which will facilitate global scale in the 6 GHz band.

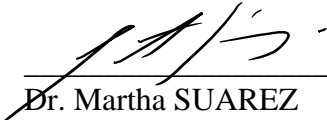
The DSA encourages the FCC to affirm the importance of indoor standard power operations by allowing AFC systems to incorporate BEL in their calculations for devices that meet the Commission’s Low Power Indoor product form factor requirements. We further encourage the FCC to streamline the approval process of both AFC systems and such standard

³ *Office of Engineering and Technology Seeks Comments on Wi-Fi Alliance Request for Waiver of Section 15.407(l)(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).

power composite devices, which will facilitate global scale to the benefit of American consumers and enterprises.

The DSA and its members look forward to working with the FCC to assist it to bring the benefits of its 6 GHz sharing framework and the use of AFC systems to commercial reality in the very near future.

Respectfully submitted,



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Dynamic Spectrum Alliance

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