



13221 Woodland Park Road, Suite 410
Herndon, VA 20171

17750 Creamery Road, Suite B10 South
Emmitsburg, MD 21727

800-482-8282
Fax: 703-524-1074
www.EnterpriseWireless.org

August 24, 2022

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: WP Docket No. 18-295
Ex Parte Letter

Dear Ms. Dortch:

The August 16, 2022, *ex parte* presentation filed by the Southern Company (“Southern”) confirms the need for the Federal Communications Commission (“FCC”) to revisit its decisions regarding the interference potential of 6 GHz unlicensed low power indoor (“LPI”) devices to fixed microwave links. On behalf of its many members that rely on 6 GHz links in support of critical communications networks, the Enterprise Wireless Alliance (“EWA”) urges the FCC to do so immediately and to consider the decertification of such devices pending a re-evaluation of this critical issue.

Like Southern, EWA does not oppose the introduction of unlicensed devices in the 6 GHz band. It appreciates the compelling interest in making additional spectrum available for these types of uses and believes spectrum sharing can be implemented successfully – if appropriate measures are taken to protect the operations of existing licensees. Based on Southern’s extensive work in this band, those measures have not been adopted in the 6 GHz band.

The fundamental issue is how to reconcile the Monte Carlo simulations on which the FCC relied in its decision with the very different results of real-world testing subsequently submitted by Southern. Of course, probabilistic modeling is a useful tool when evaluating possible uses of spectrum. However, when real-world testing produces significantly different results, as is the case here, and when the details of the simulations have not been publicly disclosed and, thus, cannot be independently evaluated, further review is needed.

Southern’s detailed analysis of this issue is based on its assertion that the “Monte Carlo simulation data: (1) is woefully outdated; (2) is unavailable for Commission or public peer review; (3) fails to consider the effects of beacon signals that were measured during the Southern testing; and (4) utilizes inputs that are inconsistent with duty cycles,

Ms. Marlene H. Dortch

August 24, 2022

Page 2

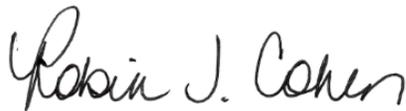
power levels, and other technical parameters that were gathered from the real-world Southern testing.”¹ Fortunately, there is a solution. As Southern and others have urged for some time, the FCC should require 6 GHz incumbents, and unlicensed proponents to undertake collaborative real-world testing pursuant to guidance from and participation by the FCC. Since EWA assumes unlicensed proponents do not intend to cause interference to critical microwave links or wish to assume responsibility and economic obligations for interference resulting from unlicensed devices, they should have no objection to participating in such testing.

6 GHz fixed microwave links play an absolutely critical role in public safety, critical infrastructure, other essential business enterprises, and common carrier communications networks. The significant differences between the results of real-world testing using commercially available devices and simulations that Southern contends are based on flawed input must be resolved as promptly as possible.

Please feel free to contact me if you have any questions or comments.

Sincerely,

ENTERPRISE WIRELESS ALLIANCE



Robin J. Cohen

President/CEO

13221 Woodland Park Road, Suite 410

Herndon, VA 20171

(703) 528-5115

robin.cohen@enterprisewireless.org

cc via e-mail:

Umair Javed

Ethan Lucarelli

Danielle Thumann

Shiva V. Goel

Erin Boone

Ron Repasi

Ira Keltz

Michael Ha

Nicholas Oros

Thomas Struble

¹ Southern Company *ex parte* letter dated August 16, 2022, at 9.