



Leaders in Public Safety Communications®

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Re: Notice of *Ex Parte*, PS Docket 18-295

On May 4, the undersigned met with Ira Keltz, Anthony Serafini, Bahman Bandipour, Martin Doczkat, and Nicholas Oros of the Office of Engineering and Technology (OET) for a constructive discussion regarding applications for special temporary authority (STA) for experimental operations in the 6 GHz band.

Several STA applications for experimental use of unlicensed 6 GHz devices have been granted or are pending. Given the risk of interference from unlicensed devices operating on the same channels licensed for public safety microwave links, these applications must be carefully evaluated. While real-world testing was not conducted prior to adoption of the 6 GHz Order, subsequent testing has confirmed the potential for interference and demonstrated that fundamental assumptions in the Order were incorrect.¹ Against this backdrop, APCO recommended that OET take steps beyond its typical evaluation process to ensure experimental STA applications contain sufficient details and interference resolution processes to protect public safety incumbents.

Considering the importance of the 6 GHz band and the mission critical communications it supports, applications to conduct experimental testing should describe what devices will be tested and where and when testing will occur with particularity. Whether devices are classified as low power indoor, standard power, or client devices, are operating indoors or outdoors, and are prototypes or off-the-shelf is important for evaluating the risk of interference and should therefore be noted in the applications. The types, numbers, and locations of user devices should also be specified. Public safety entities that might have 6 GHz operations in the testing areas should be made aware of the pending experimental testing and should have notice of the specific dates and times that warrant heightened

¹ Letter from Larry F. Butts, Manager, Telecom Engineering, Southern Company Services, Inc., to Marlene H. Dortch, Secretary, FCC in ET Docket No. 18-295, GN Docket No. 17-183 (filed June 23, 2021) Attachment A, Test Report on the Effects of 6 GHz Unlicensed RLAN Units on Fortson to Columbus Microwave Link, available at <https://www.fcc.gov/ecfs/search/search-filings/filing/106231367519302>.

monitoring for potential interference. An entity operating under experimental STA should coordinate with public safety entities to establish a process for identifying and reporting potential interference, taking into account the extent of the public safety entities' capabilities, or lack thereof, to monitor the spectrum environment for interference. If interference occurs during experimental testing, the experimental operations should immediately be suspended, and a report should be made to OET. With detailed reporting, the experimental STAs could be critical learning opportunities for OET and 6 GHz incumbents, not just the STA recipients.

Finally, APCO inquired about two issues related to AFC operators' ability to identify and protect public safety links: the timeline for updating ULS to accommodate temporary microwave links and whether a method had been developed to prevent interference to public safety systems operating under emergency STA. As APCO has explained, it's unclear how AFCs will prevent interference to public safety systems operating under an emergency STA because information about their operations is not required to be filed in ULS until ten days after the STA has been granted.

Respectfully submitted,

APCO INTERNATIONAL

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