January 27, 2023

EX PARTE VIA ELECTRONIC FILING

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


Dear Ms. Dortch:

By this letter, APCO International, AT&T Services, Inc., Comsearch, the Edison Electric Institute, the Enterprise Wireless Alliance, the Fixed Wireless Communications Coalition, the Utilities Technology Council, and Verizon (collectively, the “Joint Filers”), pursuant to Section 1.41 of the Commission’s rules, seek a clarification of the recent Office of Engineering and Technology (“OET”) Public Notice conditionally approving Automated Frequency Coordination (“AFC”) System proposals (the “AFC Proposals”) for the 6 GHz band. In particular, the Joint Filers seek clarification that the Public Notice does not override industry consensus standards, including propagation model parameters specified by the Wireless Innovation Forum (“WiInnForum”) in its standards document known as WINNF-TS-1014.

1 47 C.F.R. § 1.41.


In late 2021 and early 2022, entities that filed AFC Proposals committed to the Commission that their AFC systems would comply with industry standards, such as propagation model parameters, that had been under development by WiInnForum since the issuance of the 6 GHz Report & Order. On October 31, 2022, consistent with the Commission’s expectations, WiInnForum filed in this proceeding WINNF-TS-1014. That document contains dozens of specifications regarding the operation of AFC systems, all of which were achieved via broad inter-industry consensus through lengthy, painstaking, holistic, expert, and detailed deliberations. Among those specifications, as key and inextricably intertwined components of the overarching agreement, are the following propagation model parameters: a 95% threshold for “confidence” and an 80% threshold for “reliability” for calculations using the Irregular Terrain Model (“ITM”) and an approximately 84% confidence threshold for calculations using the WINNER II model.

Two days later, on November 2, 2022, the Public Notice was released. The Public Notice stated incorrectly—although understandably, given how recently WINNF-TS-1014 had been filed—that “[i]n the case of these propagation model parameters, it appears that, to date, the industry has not yet reached a consensus.”

Because WINNF-TS-1014 memorializes the industry consensus achieved regarding confidence and reliability parameters for the propagation models in AFC system calculations, the Joint Filers seek OET’s clarification that the Public Notice should not be interpreted to override WINNF-TS-1014. In other words, the Joint Filers urge OET to specifically clarify that the Public Notice should not be interpreted as superseding any specific values in WINNF-TS-1014—a document regarding which, at the Commission’s urging, incumbent and unlicensed device interests, among others, worked diligently over a substantial period of time to develop procedures and practices that all stakeholders believed were acceptable taken as a whole.

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4 See, e.g., Public Notice at 3 (¶ 5 n.18) (“Each conditionally approved AFC system operator states that it relies on current or future Wi-Fi Alliance and WinnForum specifications as part of their proposals”).


6 See, e.g., 6 GHz Report & Order, 35 FCC Rcd at 3919 (¶ 178) (encouraging multi-stakeholder group (“MSG”) to address “AFC system development for standard power access points,” including “how to implement the required propagation models”). The MSG delegated certain tasks to existing industry organizations, such as WiInnForum.

7 See WiInnForum Ex Parte.

8 WINNF-TS-1014 at 44 & 45, Table 6. The WINNER II confidence factor is described in requirement R2-AIP-34, which states that the standard deviation ($\sigma_{\text{CPL}}$) is to be subtracted from the median pathloss. In general, different confidence levels can be computed by subtracting some factor times the standard deviation from the median value. Assuming that the dB loss values follow a normal distribution, a factor of 1.0 standard deviation is approximately an 84% confidence level.

9 Public Notice at 17 (¶ 38).

10 In addition to the reasons explained above, as OET states, “there is value in having the AFC systems make uniform assumptions when . . . implementing the propagation models.” Id.
Should any questions arise concerning this *ex parte*, please do not hesitate to contact any of the undersigned.

Respectfully submitted,

APCO INTERNATIONAL

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