

February 7, 2014

Mr. Julius Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554 USA

Ref: ET Docket No. 13-49, in particular Section III.B.4, ¶101 and ¶97

Dear Mr. Knapp:

The purpose of this letter is to give OET a brief summary of activities coordinated by IEEE 802.11 that are addressing issues raised in the sections of the NPRM referenced above (ET Docket No. 13-49, Section III.B.4, ¶101 and ¶97).

In August of 2013, the Regulatory Standing Committee of IEEE 802.11 created a “Tiger Team” to bring together interested participants to exchange technical ideas and explore possible solutions to the band sharing issue as proposed in this NPRM. This group, referred to as the DSRC Coexistence Tiger Team, operates under the auspices of the IEEE 802.11 working group. Conference calls are conducted weekly, and submissions and emails are openly available to the public on IEEE document servers.¹ As stated in a recent presentation to the Tiger Team, the objective of the group is to **“Create a document that describes and quantifies possible coexistence mechanisms between DSRC and extensions of the 802.11 base standard in the proposed UNII-4 band, if the FCC allows such band sharing in a future R&O.”**²

The current work items for the group (as stated in the same presentation) are:

- Review of ITS/DSRC field trials conducted to date
- Review of work to date on coexistence
- Presentations on use cases
- Presentation of possible coexistence approaches
- Modeling/simulation of possible coexistence approaches
- Prototype testing of proposed approaches

Participants in the Tiger Team have a variety of perspectives, including the WLAN and automotive industries, government, and academia. Since its inception, the group has engaged in

¹ Documents are available on the IEEE document server called “Mentor.” The 802.11 Regulatory Standing Committee documents can be found at https://mentor.ieee.org/802.11/documents?is_dcn=DCN%2C%20Title%2C%20Author%20or%20Affiliation&is_group=0reg Email archives for the IEEE 802.11 Regulatory Standing Committee can be found at <http://www.ieee802.org/11/email/stds-802-11-reg/>

² “Agenda for DSRC Coexistence Tiger Team Call 10 Jan 2014, <https://mentor.ieee.org/802.11/dcn/14/11-14-0028-01-0reg-agenda-for-dsrc-coexistence-tiger-team-call-10-jan-2014.ppt> , Jim Lansford (CSR)

extensive discussions about the status and performance of DSRC systems, explored requirements for band sharing, and had presentations on some preliminary proposals for sharing techniques. Various entities are working on simulation and modeling of these proposals as well as testing of prototypes as they are developed. The goal is to reach some level of consensus about the viability of one or more techniques for protecting DSRC systems from harmful interference, as stated in the NPRM. Modeling and simulation efforts are underway, and there is the possibility that more coexistence methods may be proposed in the coming months that would also be incorporated into the analysis. Initial results from these simulation efforts are anticipated by mid-2014. Prototype development is also underway, and initial results from tests of these prototypes are anticipated to begin in the latter part of 2014. IEEE 802.11 sponsored technical activities will continue to explore DSRC coexistence techniques through 2014 and beyond. If viable candidates for sharing are identified as part of this effort, we anticipate extensive field testing will be conducted by WLAN and DSRC stakeholders outside of IEEE 802.11. We expect all these efforts to yield credible technical proposals that will eventually garner industry support and assist the FCC in moving forward with this NPRM.

The IEEE 802.11 DSRC Coexistence Tiger Team will continue to update OET on the progress of the work of the group as mature and vetted results are available, and would appreciate any feedback or inquiries that the FCC might have concerning IEEE 802.11's activities.

Inquiries and feedback should be addressed to the chair of IEEE 802.11:
Bruce Kraemer, Phone: 321-427-4098, Email: bkraemer@ieee.org

Respectfully Submitted,

A handwritten signature in cursive script that reads "Paul Nikolich".

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