

May 12, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, NW  
Washington, DC 20554

Re: In the Matter of Revision of Part 15 of the Commission's Rules, ET Docket No. 13-49

Dear Ms. Dortch:

With the release of FCC NPRM 13-22 (Docket 13-49), the United States Federal Communications Commission has requested comments regarding allowing unlicensed devices such as those using 802.11-based standards to share the 5.9 GHz band, which is currently allocated for DSRC and other services. If sharing is allowed, the FCC would create a new set of rules for the band that would become U-NII-4. The IEEE 802.11 Regulatory Standing Committee provided an open, public forum to study the issues surrounding U-NII-4 band sharing between Wireless Local Area Networks and Dedicated Short Range Communications; this DSRC Coexistence "Tiger Team" has examined some initial ideas for how band sharing could work. The complete record of the work of the Tiger Team since its inception in August 2013, identifies the issues surrounding the proposed band sharing ideas discussed in the group, assesses the level of support for these concepts among the participants in the group, and recommends next steps for validating the sharing methods. The record is contained at [https://mentor.ieee.org/802.11/documents?is\\_group=0reg](https://mentor.ieee.org/802.11/documents?is_group=0reg).

The record will inform regulators about initial discussions regarding the feasibility and practicality of sharing the 5.9 GHz band and outlining future analysis and field/lab testing that needs to take place to assure that these techniques will protect DSRC transmissions from harmful interference when deployed in the mass market.

Thank you for consideration of this information. If there are any questions, please contact me.

Regards,

By: \_\_\_\_\_/ss/\_\_\_\_\_.

Paul Nikolich  
IEEE 802 LAN/MAN Standards Committee Chairman  
em: p.nikolich@ieee.org