
**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Modernizing and Expanding Access)
to the 70/80/90 GHz Bands) WT Docket No. 20-133
)

Comments of IEEE 802

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1 Introduction

IEEE 802 LAN/MAN Standards Committee (LMSC) is pleased to provide comments on the above-captioned proceeding to the NPRM in the matter of modernizing and expanding access to the 70/80/90 GHz bands dated 9 June 2020.

IEEE 802 LMSC is a leading-consensus-based industry standards body, producing standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). We appreciate the opportunity to provide these comments to the Commission.

IEEE 802 is a committee of the IEEE Standards Association and Technical Activities, two of the Major Organizational Units of the Institute of Electrical and Electronics Engineers (IEEE). IEEE has about 420,000 members in about 190 countries and supports the needs and interests of engineers and scientists broadly. In submitting this document, IEEE 802 acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802. Therefore, this submission should not be construed as representing the views of IEEE as a whole.¹

With the release of FCC NPRM WT Docket 20-133, the United States Federal Communications Commission has requested comments regarding Modernizing the 70/80/90 GHz bands rules and proposing appropriate changes to ensure the spectrum supports its highest and best use. In this NPRM it is proposed to facilitate the provision of wireless backhaul for 5G, as well as the deployment of broadband services to aircraft and ships, while protecting incumbent operations in the 70/80/90 GHz bands.

¹ This document solely represents the views of the IEEE802 LAN/MAN Standards Committee and does not necessarily represent a position of either the IEEE, the IEEE Standards Association or IEEE Technical Activities.

2 Comments

IEEE 802 commends the FCC for the leadership in supporting and promoting the implementation of broadband services both mobile and fixed by allocating spectrum and favorable rules of operation in the relevant bands. One such recent example is the ruling on the 6 GHz band which extends the current spectrum available for WLAN services using IEEE 802 standards.

With respect to this proceeding, IEEE 802 supports the FCC proposed actions to promote the use of 70/80/90 GHz spectrum bands for backhaul, communication to ships and aircrafts, and encourage other innovative uses in the spectrum.

The FCC currently has rules for operation in the 57-71 GHz spectrum in Part 15.255, which supports WiGig based on IEEE Std 802.11-2016, proximity communications based on IEEE Std 802.15.3e-2017 and IEEE 802.15.3f-2017, backhaul, as well as a range of other short-range applications that are continuing to evolve including the use of on-board aircraft communication services.

The 70/80/90 GHz spectrum offers characteristics that would greatly benefit some of the known applications including the use aboard aircraft, and also enable future new uses. Therefore IEEE 802 recommends that the FCC also consider comprehensive rules for indoor operation in the 71-76, 81-86, 92-94, and 94.1-95 GHz bands. We further recommend that those rules be the same rules described in Part 15.255 so that the device/s may operate seamlessly across the existing and new spectrum.

3 Conclusion:

IEEE 802 applauds the FCC actions in further promoting the broadband services for commercial use by making available additional spectrum with favorable rules. IEEE 802 requests the FCC to consider making the 70/80/90 GHz bands also available for indoor use under the same rules described in Part 15.255.

IEEE 802 thanks the Commission for providing an opportunity to comment on the NPRM WT Docket 20-133 and respectfully requests these comments be considered by the Commission during the final rule making process.

Regards,

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