



April 26, 2021

Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission

Via ECFS filing

Re: *Amendment to Part 101 to Facilitate Wireless Backhaul*, WT Docket No. 10-153;
Modernizing and Expanding Access to the 70/80/90 GHz Bands, WT Docket No.
20-133

Dear Ms. Dortch:

5G Americas¹ submits this *ex parte* communication in support of the Federal Communications Commission's ("FCC") proposal for relaxation of the antenna standards in the 70/80/90 GHz bands. The proposed rule changes to allow for smaller, lighter antennas has been pending before the Commission for almost a decade.² As AT&T,³ CTIA, and the 5G Wireless Backhaul Advocates⁴ recently called for, amending the current requirements applicable to directional antennas operating in the 71-76 GHz and 81-86 GHz band⁵ would facilitate deployment of 5G. The public interest would be served by granting these proposed amendments immediately, independent of the Commission's continued consideration of more complex proposals to add new services to the band, such as endpoints-in-motion.

¹ 5G Americas is an industry trade organization composed of leading telecommunications service providers and manufacturers. Our mission is to advocate for and foster the advancement and full capabilities of 3GPP technologies including 5G, throughout the ecosystem's networks, services, applications and wirelessly connected devices in the Americas. Currently chaired by AT&T, 5G Americas' Board of Governors includes, Cable & Wireless, Ciena, Cisco, Crown Castle, Ericsson, Intel, Mavenir, Nokia, Qualcomm, Shaw, Samsung, Telefónica, VMware, and WOM.

² FCC proposed the rule change in 2012 as part of the WT Docket No. 10-153.

³ Letter from Robert Vitanza, Assistant Vice President–Senior Legal Counsel, AT&T, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-153 *et al.* (filed Apr. 13, 2021) ("AT&T Ex Parte").

⁴ Letter from Jeffrey A. Marks, Vice President, Regulatory Affairs North America, Nokia on behalf of 5G Wireless Backhaul Advocates, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-153 *et al.* (filed Mar. 1, 2021) ("5GWBA Ex Parte").

⁵ *See* 47 C.F.R. § 101.115(b)(2).

These rule changes – well-supported in the record - include those applicable to maximum beamwidth, minimum antenna gain, and co-polar and cross-polar discrimination.⁶ These rule changes, including to reduce the minimum gain from 43 dBi to 38 dBi, would facilitate the use of the 70/80 GHz band for 5G backhaul – a highly efficient use of the band – in both dense urban networks and in suburban and rural deployments.⁷ There is consensus in the record that the proposed rule changes would serve the public interest and facilitate 5G deployment, as well as the user experience, in the U.S.

The smaller and lighter antennas made possible by a 38 dBi gain have been in place in Europe and other markets for over a decade. As an association advocating for harmonized deployment of 3GPP technologies, 5G Americas supports harmonizing U.S. technical rules with that of other major markets, particularly given the lower gain's potential for facilitating 5G backhaul. There is no technical reason the Commission cannot continue to consider the various endpoints-in-motion proposals while moving forward on rule changes that would provide economies of scale to U.S. customers and allow U.S. providers to keep their pace in deployment of this critical technology. Simply put, the Commission should not delay progress on making 5G backhaul more efficient while it continues to review endpoint-in-motion proposals.

In contrast, there is *not* consensus in the record on use of the 70/80 GHz band by endpoints-in-motion. The consideration of endpoints-in-motion in the band appears to have delayed the Commission from moving forward on practical, modest rule changes to the fixed wireless antenna rules. Changes to the fixed antenna rules are completely independent of the various endpoints-in-motion proposals. Smaller antennas with lower minimum gain will *not* be more sensitive to potential interference caused by emissions from endpoints-in-motion compared to fixed service antennas currently on the market. Nor will antennas with the lower minimum gain of 38 dBi result in more interference *into* proposed endpoints-in-motion, were the FCC ultimately to allow that use.⁸ The Commission can therefore move forward now on the proposed reduction in minimum gain for antennas and other technical improvements for fixed operation in the 70/80 GHz band, as the record supports.

As 5G Americas noted almost two years ago, more flexible antenna gain requirements for the 70/80 GHz band are needed. This is even more the case now, given the spectacular uptake of 5G over the last twelve months.⁹ The Commission has done so much to support U.S. leadership in 5G. These additional, long-pending and widely-supported rule changes would continue those efforts to facilitate the infrastructure necessary for 5G deployment. 5G Americas respectfully requests that the Commission act with haste to amend Part 101.115(b)(2) to allow a minimum gain of 38 dBi for directional antennas operating in 70/80 GHz band and other rule changes on co-polar and cross-polar discrimination and maximum beamwidth.

⁶ See, e.g., AT&T Ex Parte at 1.

⁷ See Comments of 5G Americas, WT Docket No. 20-133 *et al.* (filed Aug. 5, 2020); Letter from Chris Pearson, President, 5G Americas, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-153 *et al.* (filed May 6, 2019).

⁸ See 5GWBA Ex Parte at 2.

⁹ See Press Release, 5G Americas, 5G Achieves Mass Mkt. Appeal (Mar. 25, 2021), [https://mailchi mp/5gamericas/q1subscriber2021?e=4fa4326cfa](https://mailchi.mp/5gamericas/q1subscriber2021?e=4fa4326cfa) (5G technology has an adoption rate three times as fast of 4G. fastest cellular technology ever).

Respectfully Submitted,

A handwritten signature in cursive script that reads "Chris Pearson".

Chris Pearson
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cc: Umair Javed
Ethan Lucarelli
Greg Watson
Bill Davenport
Erin Boone