Wireless Innovation Forum offers comments on FCC Public Notice on Licensing Models and Technical Requirements in the 3550-3650 Band

*Enthusiastically supports FCC efforts in defining Harm Claim Thresholds and provides recommendations on establishing multi-stakeholder groups to address specific interference and interference mitigation issues*

**For Immediate Release**

*Washington, DC,* **5 December 2013** – [The Wireless Innovation Forum](http://www.WirelessInnovation.org) (http://[www.WirelessInnovation.org](http://www.WirelessInnovation.org)), a non-profit international industry association dedicated to driving the future of radio communications and systems worldwide, today filed comments with the FCC on the public notice seeking comment on licensing models and technical requirements in the 3550-3650 band.

In previous responses to similar topics, the Forum has expressed its support for spectrum sharing and the use of small cell technology in the 3.5 GHz band (<http://groups.winnforum.org/d/do/6495>) and the value of utilizing multi-stakeholder groups. In the current comments, the Forum elaborates on the foundational elements of multi-stakeholder groups, as well as the opportunity to define not only the operating rules for the 3550-3650 band, but significant future shared spectrum bands.

In the comments, the Forum enthusiastically supports the FCC efforts in defining Harm Claim Thresholds as a tool to determine appropriate relationships between primary and secondary users, and increased multiuse spectrum available for both narrowband and wideband systems. The Forum also supports regulatory and policy development based on services rather than technology to continue fostering innovation in all areas of science and technology used in communication systems. In addition, Forum members point out that in 2013 it is important for the FCC to recognize the need to exercise a light regulatory touch in supporting innovations related to spectral sharing and frequency agile communications, which will define the next revolution in spectral efficiency.

Recommendations provided by the Forum include the formation of industry-led multi-stakeholder groups to address specific interference and interference mitigation issues, such as the CBS bands. The Forum believes the FCC will best be served by executing on the framework above to enable stakeholders to work together to form tightly focused working groups to evaluate all current and emerging technical issues that are reverent to spectrum sharing for specific use cases and frequency bands of interest. By enabling multi-stakeholder groups to participate in the process, the FCC can capture a diversity of opinions gathered and provided from different perspectives on technology, services and business models. This ensures recommendations from these multi-stakeholder groups will be responsive to the FCC rule making process for complex multiuse spectrum issues.

“The Forum believes the creation of a multi-stakeholder group is key in defining the path forward for shared spectrum. With a long tradition of guiding such efforts the Forum is well positioned to take the lead on forming and managing this process, and we invite others to join us in finding innovative solutions,” says Forum Receiver Performance Guidelines Work Group Chair Bruce Mueller of *Motorola Solutions*.

In addition, the Forum cautions the Commission against over specifying band specific solutions. The members of the Forum believe that the use of a common architectural model should be encouraged across bands where practical, allowing the standardization of interfaces where appropriate and the reuse of technologies developed for the SAS, etc. to the greatest extent possible. By maintaining architectural integrity across bands where possible, the Forum believes that the commission will better enable economies of scale to be achieved in the deployment within the 3.5 GHz CBS band, improving the business case for investment in spectrum sharing solutions and subsequently fostering competition through the creation of an ecosystem of vendors with interoperable technologies supporting the defined architecture.

The entirety of the Forum’s comments to the FCC can be found in our Document Library (<http://groups.winnforum.org/Recommendations>).

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**About the Wireless Innovation Forum**

Established in 1996, The Wireless Innovation Forum (SDR Forum Version 2.0) is a non-profit mutual benefit corporation dedicated to driving technology innovation in commercial, civil, and defense communications worldwide. Members bring a broad base of experience in Software Defined Radio (SDR), Cognitive Radio(CR) and Dynamic Spectrum Access (DSA) technologies in diverse markets and at all levels of the [wireless value chain](http://www.wirelessinnovation.org/page/Product_Services_Directory) to address emerging wireless communications requirements. To learn more about The Wireless Innovation Forum, its meetings and [membership benefits](http://sdrforum.org/pages/aboutTheForum/membership.asp), visit [www.WirelessInnovation.org](http://www.WirelessInnovation.org).

**Editorial Contacts**

Lee Pucker, 604-828-9876, Lee.Pucker@wirelessinnovation.org or

Stephanie Hamill, 970-290-9543 or Stephanie.Hamill@wirelessinnovation.org