

January 13, 2014

Responses for the record from Tom Nagel, Senior Vice President, Strategic Initiatives, Comcast Corporation

House Energy and Commerce Subcommittee on Communications and Technology
Hearing - "Challenges and Opportunities in the 5 GHz Spectrum Band"
November 13, 2013.

POST-HEARING QUESTIONS

The Honorable Steve Scalise

1. Can you provide some details on outreach that Comcast and other providers have done with potentially impacted incumbent providers? Have you been able to begin a dialogue on possibly co-existing in the band while not interfering with each other's services?

Comcast Response

Because Comcast sees UNII-4 as critical to addressing the Wi-Fi spectrum crunch, and to bringing 802.11ac "Gigabit" Wi-Fi to American consumers, we have worked hard on outreach to ITS interests. Working with and/or through the National Cable & Telecommunications Association (NCTA), we have met with a variety of ITS interests, ITS equipment vendors, and have joined an IEEE group that is discussing technical sharing approaches. Comcast and other cable companies have brought our engineers to Washington for several in-person meetings with ITS engineers, and have an ongoing presence on the IEEE discussion group. We are committed to continuing this outreach and these discussions.

But we cannot afford to allow discussions to become delay tactics. The only way that these discussions have a hope of achieving progress is if all sides are committed to flexibility. Ten years after the FCC made the spectrum available for DSRC, there is still not a single commercial DSRC product available for sale. This gives us a golden opportunity to find a sharing approach that is technically and economically feasible without having to account for devices that are already in the hands of consumers. But to do this we all have to be willing to compromise on our approach to using the band in the future so we can find ways to share. If one party refuses to consider technical changes to future products – or even to consider using different channels within the UNII-4 band than originally planned – then a consensus approach will be impossible. Comcast stands ready to be flexible. But if others are not we ask Congress to support an FCC process that acts to balance the equities even in the absence of consensus.

The Honorable Henry Waxman

1. Do you believe the technical and engineering discussions between the Wi-Fi and Intelligent Transportation Systems (ITS) communities are going well? What can the Administration do to support these discussions?

Comcast Response

Comcast believes that the UNII-4 band holds extraordinary promise to address the Wi-Fi spectrum exhaust problem, and to deliver 802.11ac “gigabit” Wi-Fi to American consumers. We also believe that the best path forward is one where Wi-Fi and ITS share the band in a way that Wi-Fi does not cause harmful interference to deployed ITS systems.

As a consequence, we have worked hard to reach out to the ITS/DSRC community. The ITS industry first asked the FCC for access to this spectrum in 1997, and the FCC opened up the band for DSRC a decade ago. Today, however, there are still no commercial DSRC products. This gives us a golden opportunity to set rational rules without the need to account for devices that are already in the field. But while discussions are underway, they have not made forward progress.

The only way that a consensus approach is possible is if all parties are willing to be flexible – most importantly by agreeing to adjust their approaches, including things as simple as the channels within the UNII-4 band that they wish to use for future services. Comcast is ready to make a compromise work and we hope that the ITS/DSRC interests will take the same approach. The best way that the Administration could support constructive discussions therefore would be to make it clear that all parties must be willing to adjust their technical approaches to make sharing work, and to indicate that if one set of interests refuses to do so the FCC will adopt rules that properly balance the equities even in the absence of consensus.

Waxman 2:

What is your perspective on the proposals that have been put forth by Qualcomm and Cisco to resolve the interference challenge of sharing Wi-Fi devices with DSRC devices in the same band?

Comcast Response

Qualcomm and Cisco are equipment vendors that serve both ITS and Wi-Fi companies. So the fact that they have offered proposals for effective sharing is very meaningful – each company understands the relevant technologies and has an incentive to find a balanced solution. Comcast is actively in talks with both Qualcomm and Cisco to explore whether either approach would be technically and

economically viable for our Wi-Fi network. We intend to pursue both paths, and, as we understand the implications of each, determine whether one or both could offer the best way forward. But it is critical that all parties – Wi-Fi and ITS interests alike – keep their minds open as we work together. Some ITS interests have refused to even consider the Qualcomm approach. This is counterproductive. Consequently, we encourage Congress to strongly advise all parties to roll up their sleeves, make compromises, be willing to adjust their technical approaches, and find the best way to maximize the overall value of the band to American consumers.