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January 22, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20555

Re: **Qualcomm Technologies, Inc. (“Qualcomm”), Application for Special Temporary Authority (“STA”); Application File No. 1115-EX-ST-2015**

Dear Ms. Dortch:

On October 8, 2015, Qualcomm submitted the above referenced request for STA to conduct tests of equipment that will use Long Term Evolution (“LTE”) technologies in, among others, 5 GHz bands designated for unlicensed devices. Wi-Fi Alliance members produce and develop the billions of Wi-Fi devices that also operate in this spectrum band.

On January 21, 2016 Qualcomm amended its application to more fully describe the nature of the tests it intends to conduct. In particular, Qualcomm states that the STA request is intended to enable “very small scale product development testing” of equipment at two sites. It notes that in addition to the proposed testing in Raleigh, NC and Oklahoma City, OK, it intends “to conduct separate and independent LTE-U/Wi-Fi coexistence testing in a real-world environment at a Verizon facility using Wi-Fi Alliance’s draft test plan” and that Wi-Fi Alliance would be invited to observe these preliminary coexistence tests. Qualcomm further observes that it, Verizon and other companies intend to conduct LTE-U/Wi-Fi coexistence testing in a laboratory environment using the coexistence test plan being developed by Wi-Fi Alliance.

Wi-Fi Alliance recognizes and appreciates Qualcomm’s continued engagement in the critical work that Wi-Fi Alliance is conducting on Wi-Fi/LTE-U coexistence. Qualcomm representatives attended the initial Wi-Fi Alliance coexistence workshop on November 4, 2015 and have registered for the next workshop, scheduled for February, 10, 2016. Based on the commitments in the recent amendment to its STA request, Wi-Fi Alliance has no objection to the FCC granting the STA request so that testing can occur. However, Wi-Fi Alliance remains concerned about the widespread introduction of LTE-U devices into the Part 15 ecosystem, and Wi-Fi Alliance remains hopeful that before the Commission approves the routine use of LTE-U products, the Commission will evaluate the results of testing in real world scenarios to demonstrate that LTE-U devices can coexist fairly with other Part 15 products.

If there are any questions, the Commission is asked to contact the undersigned directly.

Very truly,

A handwritten signature in black ink, appearing to read 'Edgar Figueroa', with a long horizontal flourish extending to the right.

WI-FI ALLIANCE

Edgar Figueroa
President and CEO

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cc: Julius Knapp (via e-mail)