

## **NARRATIVE STATEMENT**

Pursuant to Section 5.63(c)(1) of the Rules and Regulations of the Federal Communications Commission (“FCC” or the “Commission”), Sound Internet Services, Inc. dba PogoZone (“PogoZone”) hereby demonstrates support for its application for an experimental license to conduct market trials, as defined in Section 5.602 of the Commission’s rules, to evaluate the utility of unlicensed 6 GHz operations for the provision of broadband services. This Narrative Statement provides a description of the experimentation proposed and how the market trial has a reasonable promise of contribution to the development, extension, expansion, or utilization of the radio art.

### **Overview**

Last year, the Federal Communications Commission (“FCC” or the “Commission”) designated additional spectrum in the 6 GHz band for unlicensed operations, envisioning its use for “new innovative technologies and services that will advance the Commission’s goal of making broadband connectivity available to all Americans, especially those in rural and underserved areas.”<sup>1</sup> With an ever-increasing demand for wireless broadband, the Commission continues to seek ways to lessen any existing and anticipated congestion where Wi-Fi is presently deployed.<sup>2</sup> The proposed market trial seeks to advance these goals by testing available equipment across the UNII-5 band for potential delivery of enhanced fixed wireless broadband services.

### **Description of Program**

The experimental operations will involve field deployment and testing of Cambium Networks 6 GHz radio technology on four towers at rural sites in Whatcom County. These operations will evaluate the greater throughput capabilities available in these bands using 80/160 MHz channels. The program will also use up to sixty remote units at customer locations. Each location will deploy directional antennas that will transmit on the 5925-7125 MHz band. Radios will be locked to operate only in the UNII-5 (5.925-6.425 GHz) and UNII-7 (6.525-6.875 GHz) bands.

### **Objectives of Experimental Program**

The purpose of the market trials is to determine the financial and technical viability of unlicensed spectrum in the 6 GHz band to support delivery of enhanced fixed wireless broadband services to consumers in rural and underserved areas of the United States.

### **Protection Against Interference**

PogoZone’s data collection program will operate without causing harmful interference to incumbent users. PogoZone will work with any nearby licensed incumbents that it identifies, based on information provided in the FCC’s databases, to ensure that its operations will avoid any harmful impact on such existing users.

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<sup>1</sup> See *In the Matter of Unlicensed Use of the 6 GHz Band*, 35 FCC Rcd 3852, 3853 (2020).

<sup>2</sup> *Id.*

## **Contribution to the Radio Art**

In accordance with Section 5.63(c)(1) of the FCC's rules, PogoZone expects that its market trial will contribute to the radio art. PogoZone's market trials will seek to determine the financial and technical viability of unlicensed spectrum in the 6 GHz band that could ultimately help support delivery of enhanced fixed wireless broadband services to consumers in rural and underserved areas of the United States.