

***Wireless Communications Association International
1140 Connecticut Avenue, NW, Suite 810
Washington, DC 20036
telephone: 202-452-7823
fax: 202-452-0041
www.wcai.com***

November 2, 2001

BY ELECTRONIC FILING

Ms. Magalie Salas, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: IB Docket No. 00-203, *Partial-Band Licensing of Earth Stations in the Fixed-Satellite Service That Share Terrestrial Spectrum*

Dear Ms. Salas:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, on behalf of the Fixed Wireless Communications Coalition (FWCC), I am filing this letter electronically to report an oral ex parte communication in the above-referenced proceeding.

Yesterday, Ron Coles, Doug Docherty (by telephone), Robert Gurs, Tom Keller, Mitchell Lazarus, and the undersigned, representing the FWCC and various of its members, met with Scott Delacourt, Edward R. Jacobs, Michael Pollak, Thomas P. Stanley, and Scot Stone of the Commission staff.

We reiterated the points made in our filings. In addition, we explained it is all but impossible to document the difficulties of coordinating fixed links that arise due to claims of interference from earth station operators. No one keeps data on failed coordinations. The unsuccessful applicant simply relocates its facilities to work around the earth station (at additional cost), or moves to another band (also at additional cost) or, if necessary, looks for some other way to meet its communications needs. By way of example, we related that the state police of one northeastern state, unable to coordinate fixed service links to interconnect the base stations that serve police vehicles, had to enter into a sharing arrangement with a local utility that resulted in the intermingling of police and utility traffic on both the fixed and mobile facilities.

We further observed that the Commission should not require documentation to justify making the FS and FSS coordination rules equitable, inasmuch as the inequity is plainly apparent on the face of the rules. As we explained in our filings, an earth station is routinely licensed for

Ms. Magalie Salas, Secretary
November 2, 2001
Page 2

the entire allocated band, without regard to its actual need for bandwidth, while FS facilities, in contrast, are strictly regulated as to both spectrum efficiency and loading. This lets FSS earth stations camp on far more spectrum than they actually need, while FS operations in many parts of the country are frozen in place, unable to expand service. The unfairness of this imbalance needs no documentation

If there are any questions about this submission, please call me at the number above.

Respectfully submitted,

Andrew Kreig
President, Wireless Communications
Association International

cc: Meeting participants