

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of

Rechannelization of the 17.7-19.7 GHz
Frequency Band for Fixed Microwave Services
under Part 101 of the Commission's Rules

WT Docket No. 04-143

**REPLY COMMENTS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION
AND THE
NATIONAL SPECTRUM MANAGERS ASSOCIATION**

Pursuant to Section 1.415 of the Commission's Rules, the Fixed Wireless Communications Coalition (FWCC) and the National Spectrum Managers Association (NSMA) jointly file these Reply Comments in response to the Notice in the above-captioned docket.¹

¹ *Rechannelization of the 17.7-19.7 GHz Frequency Band*, 19 FCC Rcd 7260 (2000) ("Notice").

The FWCC is a coalition of companies, associations, and individuals interested in the Fixed Service -- *i.e.*, in terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. The membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, and/or their respective associations, landline and wireless, local, and interexchange carriers, and telecommunications attorneys and engineers. Our members build, install, and use both licensed and unlicensed point-to-point, point-to-multipoint, and other fixed wireless systems, in frequency bands from 900 MHz to 95 GHz.

The NSMA develops technical and procedural recommendations for coordination of wireless telecommunications systems and services; provides a linkage between government regulations and industry practice by developing recommendations that streamline and standardize procedures used by the frequency coordination community; and proactively advises regulatory bodies on matters affecting radio frequency spectrum policy pertaining to terrestrial microwave, satellite systems, and emerging technology radio services. Membership is open to any interested individuals.

In their first-round comments, the FWCC and NSMA supported rechannelization of the 18 GHz Fixed Service band and opposed establishment of a new 220 MHz channel pair. *All of the commenting parties support these positions.*

The FWCC and NSMA also opposed expansion of 18 GHz spectrum for final RF video distribution. The Independent MultiFamily Communications Council, a member of the FWCC, has indicated its dissent from the FWCC position,² and will file its own comments today. Comsearch points out that, if the Commission chooses to proceed with making additional spectrum available to PCOs and MVPDs for their conventional operations, it would entail additional regulatory changes that must include assigned 6 MHz channels that can be coordinated.³ The FWCC and NSMA urge the Commission to give careful consideration to the views presented on this issue.

² Letter from Mitchell Lazarus, Counsel for FWCC to Marlene H. Dortch, Secretary, FCC (filed Aug. 17, 2004).

³ Comments of Comsearch at 2-3 (filed Aug. 6, 2004).

CONCLUSION

The record in this proceeding unanimously supports adoption of the proposed rechannelization plan and abandonment of a new 220 MHz channel pair. The Commission should promptly issue a Report and Order consistent with the record.

Respectfully submitted,

Mitchell Lazarus
FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
703-812-0440
Counsel for the Fixed Wireless
Communications Coalition

Ken Ryan
Comsearch
19700 Janelia Farm Boulevard
Ashburn, VA 20147
703-726-5685
Vice-President, National Spectrum
Managers Association

September 7, 2004

SERVICE LIST

Chairman Michael Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Kathleen Q. Abernathy
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Gerald P. Vaughan Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Peter A. Tenhula Acting Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Catherine W. Seidel Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Scott D. Delacourt
Associate Bureau Chief/Chief of Staff
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

David Furth Associate Bureau Chief/Counsel
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Tom Stanley, Chief Engineer
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Aaron Goldberger, Legal Advisor
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Uzoma C. Onyeije Legal Advisor

D'wana Terry, Chief
Public Safety & Critical Infrastructure Div.
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Michael Pollak
Public Safety & Critical Infrastructure Div.
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Joel Taubenblatt, Chief
Broadband Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Cara Voth, Broadband Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554