

Fixed Wireless Communications Coalition

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December 7, 2006

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
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**Re: IB Docket No. 04-286
WRC Agenda Item 1.20
*FCC Seeks Additional Comment on Recommendations Approved by the
Advisory Committee for the 2007 World Radio-Communication
Conference Regarding the Regulatory Measures for the Protection of
the Earth Exploration-Satellite Service (Passive) from Unwanted
Emissions of Active Services
Ex Parte Communication***

On behalf of the Fixed Wireless Communications Coalition (FWCC), pursuant to Section 1.1206(b)(1) of the Commission's Rules, I am electronically filing this written *ex parte* communication.¹

The FWCC concurs with and supports the comments filed yesterday by IDT Spectrum, Inc., which holds LMDS Block B licenses at 31.0-31.3 GHz.

IDT points out that a requirement for newly reduced emissions in the 31.3-31.5 GHz band would adversely impact the immediately adjacent LMDS licenses. The technical

¹ *FCC Seeks Additional Comment*, IB Docket No. 04-286, Public Notice, DA 06-2265 (released Nov. 1, 2006). 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, cable TV and private cable providers, backhaul providers, and/or their respective associations, communications 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. For more information, see www.fwcc.us.

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difficulties of implementing these lower emissions will inevitably raise equipment costs and may further delay Block B deployment. The unexpected burdens would unfairly reduce the value of LMDS licenses, whose prices were set by the market long before the Commission gave any hint of the proposed restrictions.

In view of these considerations, the FWCC submits that adoption of the proposal is not in the public interest.

Respectfully submitted,

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