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October 31, 2008

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

Re: WTB Docket No. 07-121, In the Matter of Request for Declaratory Ruling by Wireless Strategies, Inc. Regarding Coordination of Microwave Links Under Part 101 of the Commission's rules

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, on behalf of the Fixed Wireless Communications Coalition ("FWCC"), I am electronically filing this notice of an oral *ex parte* communication in regards to the aforementioned matter.¹

On October 30, 2008, representing the interests of FWCC, Christopher Hardy, Vice President of Comsearch, and Angela Parsons, Regulatory Staff Counsel of FiberTower Corporation, met with OET Chief Julius Knapp, Deputy Chief Ira Keltz, Associate Chief Bruce Romano, Deputy Chief Alan Stillwell, Technical Analysis Chief Robert Weller, and Policy and Rules Division Chief Geraldine Matisse to reiterate FWCC's strong opposition to the Wireless Strategies, Inc. ("WSI") request for a declaratory ruling.

At the meeting the parties emphasized the many objections to the WSI request, as outlined by numerous filings by FWCC and NSMA members, as well as other commenters. Specifically, the parties discussed its concerns with WSI's proposal to circumvent the Part 101 licensing and coordination rules, in conjunction with WSI's misinterpretation of the antenna standards in Section 101.115.² WSI's proposed

¹ 47 C.F.R. § 1.1206 (2008).

² 47 C.F.R. §101 Subpart B, C (2008); 47 C.F.R. §101.115 (2008).

concurrent coordination is ill defined and lacks specific technical detail to properly evaluate coexistence with other licensees. Point-to-point microwave users are concerned about interference from unknown transmitter locations (DREs) as described in WSI's filings. The parties also noted that, contrary to WSI's assertions, the spectrum surrounding a link in the fixed point-to-point bands is not "wasted", but is either in use or may be used in the future by other licensees; to allow WSI to seize all surrounding spectrum without prior notification, licensing, or frequency coordination effectively transforms the point-to-point band into a wide-area license that benefits only one party, to the detriment of both a competitive market and the public interest.

FWCC plans to submit a supplemental *ex parte* filing detailing concerns with WSI's technical claims.

Please do not hesitate to contact us with questions.

Respectfully submitted,

/s/Angela C. Parsons

Regulatory Staff Counsel, FiberTower Corp.
for the Fixed Wireless Communications Coalition

cc: Julius Knapp
Ira Keltz
Bruce Romano
Alan Stillwell
Robert Weller
Geraldine Matisse