

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless Strategies, Inc.	)	
	)	
Request for Declaratory Ruling	)	WTB Docket No. 07-121
On Compliance of Fixed Microwave	)	DA 07-2684
Antennas Having Distributed	)	
Radiating Elements	)	
	)	

To: The Wireless Telecommunications Bureau

**REPLY COMMENTS OF  
THE FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition (“FWCC”) hereby files these reply comments in the above-referenced proceeding related to the Request for Declaratory Ruling (“Request”)<sup>1</sup> submitted by Wireless Strategies, Inc. (“WSI”) on February 27, 2007, and placed on public notice June 19, 2007.<sup>2</sup> In its Request, WSI asks the FCC to declare that “a Fixed Service licensee is permitted to simultaneously coordinate multiple links whose transmitter elements collectively comply with the Commission’s antenna standards and frequency coordination procedures.”<sup>3</sup>

Because WSI’s proposal has potentially grave interference ramifications for providers of fixed wireless service, the FWCC asked by letter dated March 26, 2007, that the FCC either deny the Request outright or, in the alternative, take no action on it without first initiating a

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<sup>1</sup> Request for Declaratory Ruling filed by Wireless Strategies, Inc., WT Docket No. 07-121 (Feb. 27, 2007) (“Request”).

<sup>2</sup> Wireless Telecommunications Bureau seeks Comment on Request For Declaratory Ruling by Wireless Strategies, Inc. regarding Coordination of Microwave Links under Part 101 of the Commission’s Rules, WT Docket No. 07-121, DA 07-2684 (rel. June 19, 2007).

<sup>3</sup> Request at 1.

rulemaking proceeding that provides interested parties a full and fair opportunity to submit comments on the matter.<sup>4</sup> FWCC commends the Commission for taking the prudent step of seeking public input in response to the Request – a process that has revealed deep concerns and overwhelming opposition to WSI’s proposal. In light of the record here, FWCC urges the Commission to bring to an end any consideration of WSI’s proposal.

FWCC noted that its preliminary review of the Request indicated that adoption of WSI’s proposal could result in significant interference to existing, licensed point-to-point microwave systems. FWCC also explained that WSI has not submitted any meaningful technical data in support of its claim that the use of sidelobe frequencies via “distributed radiating elements” would not run afoul of the required radiation pattern envelope and beamwidth requirements set forth in Section 101.115 of the Commission’s Rules (47 C.F.R. § 101.115). FWCC also described how WSI’s “concurrent coordination” concept did not comply with existing FCC rules and that WSI has not submitted any technical data demonstrating otherwise.<sup>5</sup>

Notwithstanding FWCC’s March 26 letter that decried the lack of supporting technical data provided by WSI, WSI did not participate in the initial comment round of this proceeding and thus failed to provide any additional information substantiating its claims, and it failed to address FWCC’s statement that WSI’s “concurrent coordination” concept did not comply with existing FCC rules.

In fact, several technically knowledgeable parties that filed initial comments in this proceeding, including Verizon, Alcatel-Lucent, Comsearch, the National Spectrum Managers

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<sup>4</sup> Letter from Dennis J. Guill, Fixed Wireless Communications Coalition, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 07-121 (Mar. 26, 2007).

<sup>5</sup> Request at 4-6.

Association, the Society of Broadcast Engineers, Harris Stratex Networks, TerreStar Networks & Mobile Satellite Ventures and David Popkin, all identified specific FCC rules and frequency coordination principles that were either ignored or violated by the concepts expressed in WSI's Request for Declaratory Ruling.

The FWCC hereby reiterates its concern that WSI's Request for Declaratory Ruling, including its proposal for "concurrent coordination" using "distribute radiating elements," has potentially grave interference ramifications for the fixed wireless service and almost certainly violates several existing FCC rules as identified by the above commenters.

The FWCC, therefore, requests that WSI's request for declaratory ruling be dismissed. Even if the FCC were to determine that WSI's Request is worthy of further consideration, however, the FCC may not adopt WSI's proposed dramatic changes to the interpretation of long-standing Fixed Service rules and/or policies without conducting a rulemaking proceeding subject to Federal Register notice and public comment.

Respectfully submitted,

FIXED WIRELESS COMMUNICATIONS COALITION

*/s/ Dennis J. Guill*

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